European Rule of Law Mechanism: input from Member States 2026 Rule of Law Report[1] - replies of the Slovak Republic

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.

Recommendation 1 - Introduce measures to ensure that the members of the Judicial Council, notably those not elected by judges, are subject to sufficient guarantees of independence as regards their dismissal, taking into account European standards on independence of Judicial Councils.

Ministry of Justice of the Slovak Republic is considering possible legislative changes that would regulate the grounds for the Judicial Council´s member dismissal before the expiration of his/her term of office.
Constitutional law experts have been informally consulted. The proposal could be based on the existing regulation of the reasons for the termination of the office of the President of the Judicial Council (§4b of Act No. 185/2002 Coll. on the Judicial Council of the Slovak Republic). The related case law of the Constitutional Court of the Slovak Republic (PLz. ÚS 2/2018) will be taken into account.

Recommendation 2 - Ensure that sufficient safeguards are in place and duly observed when subjecting judges to criminal liability for the crime of "abuse of law" as regards their judicial decisions.

Ministry of Justice prepared a draft amendment, which has been sent to the Venice Commission for its opinion, to avoid any further doubts about the compliance of the law with European standards.
The aim of the proposed amendments is to clarify the legal regulation of the criminal offense of the abuse of law, as well as the procedural guarantees of judges in criminal proceedings, in order to prevent possible abuse of criminal prosecution of judges.
The most advantageous solution appears to be a review of the substantive criminal law (the crime of abuse of law) in combination with a review (strengthening) of the Judicial Council's powers to disagree with the criminal prosecution of a judge.
Ministry of Justice would not mind the complete abolition of this criminal offence.
The opinion of the Venice Commission is expected in March 2026.

[1] The responses of the Slovak Republic are compiled from the inputs to the European Commission's questionnaire on the preparation of the Rule of Law Report 2026, which were provided by the Ministry of Justice of the Slovak Republic, the General Prosecutor's Office of the Slovak Republic, the Ministry of the Interior of the Slovak Republic, the Ministry of Culture of the Slovak Republic and the Office of the Government of the Slovak Republic.

Recommendation 3 - Introduce proposals to regulate lobbying, strengthen the asset declaration and verification system, and continue ongoing efforts to reform conflicts of interest rules

Ministry of Interior of the Slovak Republic: The issue of lobbying regulation in the Slovak legal system was actively addressed at various professional levels in 2025, taking into account good practice abroad. Several round tables were held with Slovak and foreign experts, resulting in a number of analytical documents.[2,3]
Ministry of Interior is currently working on the draft act on lobbying,[4] while the basic principles of the planned Lobbying Act were already published[5]. The basic starting point is to create conditions for fair and transparent influence (in the creation of legislation, public policies, the allocation of public resources, and the filling of public positions). The amendment to the law should apply to any natural or legal persons; definition of lobbying from both a positive and negative perspective; definition of lobbyists and lobbied entities; definition of the rights and obligations of lobbyists and lobbied entities; registration process; sanctions and powers of the competent authority.

Recommendation 4 - To ensure the effective and independent investigations and prosecutions of high-level corruption cases to establish a robust track record, including by preventing any undue interference and restricting the use of the Prosecutor-General's powers to annul final investigatory and prosecutorial decisions.

Ministry of Justice of the Slovak Republic: The Government´s Reaction explained that the powers of the General Prosecutor under Section 363 of the Code of Criminal Procedure are important for ensuring compliance with the law and for preventing violations of the law and arbitrary abuse of the criminal law.
The decisions under Section 363 are not in nature decisions on the merits. It is an extraordinary remedy by which the Prosecutor General does not stop the criminal proceedings, but only annuls unlawful decisions made by law enforcement authorities ("LEAs") in the preparatory proceedings.
Section 363 is used in situations where the remedy of an illegal situation cannot be ensured by other means, in particular by the procedural powers of the supervising prosecutor himself. Generally, the system of remedies is an integral part of the internal criminal law system of any democratic country
Prosecutor General in proceedings under Section 363 cannot proceed arbitrarily but strictly within the bounds of legality and must give reasons for its decisions, scrutinising carefully all the legal substantive and procedural prerequisites for the conduct of the criminal proceedings in question, and that, in exercising this extraordinary cassation power, it is guided by and within the limits of the principle of subsidiarity.

Office of the Prosecutor General of the Slovak Republic - GPO

Prosecutor General of the Slovak Republic in connection to 6RoL R and conclusions of the extraordinary evaluation of GRECO imposed on:

[2] https://www.minv.sk/swift_data/source/verejna_sprava/MVSR_prezentacia_lobing.pdf
[3] https://www.minv.sk/swift_data/source/verejna_sprava/lobing/regulacia-lobing-parlamentny-institut.pdf
[4] https://www.minv.sk/?lobing
[5] https://www.minv.sk/?tlacove-spravy&sprava=ministerstvo-vnutra-spristupnilo-zakladne-vychodiska-k-pripravovanemu-zakonu-o-lobingu

a) **Director of the Serious Crime Department in cooperation with Regional Prosecutors** to request summary reports of regional prosecutors **on the manner of termination and current status of proceedings in corruption criminal offences, which were transferred into their competence following the dissolution of the Special Prosecutor's Office and to subsequently prepare on its basis an analysis or generalization of the continuity and fluency of criminal prosecution of** criminal offences of corruption after their referral from the Special Prosecutor's Office of the General Prosecutor's Office of Slovak Republic to the Regional Prosecutor's Offices. Submit these analyses to the Prosecutor General.
Deadline: until 31 March 2026

In this regard:
The Regional Prosecutors are to send to the director of the Serious Crime Department of the General Prosecutor's Office of Slovak Republic summary reports **on the manner of termination and current status of proceedings in matters of criminal offences of corruption, which were transferred into their competence following the dissolution of Special Prosecutor's Office, including identified deficiencies in individual cases and measures adopted for their rectification.**
Deadline: until 31 November 2025

b) Based on the report from the evaluation, Director of the Serious Crime Department of the General Prosecutor's Office in cooperation with Regional Prosecutors are to propose measures to the Prosecutor General of the Slovak Republic to fulfill activities within the GRECO recommendation in section IV. (iv).

„(iv)
i) conducting a comprehensive review of the current framework for specialized focus of Prosecutor's Office regarding corruption cases with the aim to identify the possible deficiencies or weaknesses and on the bases of their public findings to implement further measures; and
ii) development of a formal specialization and continuous professional development plan of prosecutors with the aim to secure compliance with anti-corruption regulations"

Deadline: at the latest by 31 March 2026

In this regard:
Regional Prosecutors are to send to the Director of the Serious Crime Department of the General Prosecutor's Office of Slovak Republic proposals of their own measures to fulfill the recommendation within their subordination.
Deadline: by 30 November 2025

c) **Director of Department for Legislation, Strategy and Constitutional Law of the General Prosecutor's Office of the Slovak Republic is to participate in the legislative process of the Ministry of Justice of the Slovak Republic aimed at fulfilling the Subsection 122 of the evaluation report** (*so that objective and transparent criteria for reallocation of cases are introduced into legislation by Slovak authorities, to prevent potential public perception questioning the motivation of reallocation of cases to new prosecutors*.)
Deadline: according to the requirements of Ministry of Justice of the Slovak Republic

The Prosecutor General issued a service regulation: Instruction of the Prosecutor General of the Slovak Republic, No. 17/2025 of 30 December 2025 on the establishment of specialization of prosecutors for criminal offences of corruption, according to which a specialization of prosecutors for the criminal offences of corruption (Section 328 – Section 336d of Criminal Code of the Slovak Republic) is being established at the Regional Prosecutor's Offices and the Serious Crime Department of the General Prosecutor's Office of the Slovak Republic.

Specialization is defined as the main focus of activities of the prosecutor. **The Serious Crime Department of the General Prosecutor's Office and every Regional Prosecutor's Office is thus staffed with 3 specialists.**

(Instruction of the Prosecutor General is enclosed)

Coordination among LEAs

On the basis of the initiative of the General Prosecutor's Office at the annual meeting of the Expert Coordination Body for the Fight Against Crime, **a National Expert Group of Law Enforcement Authorities for the Fight against Corruption was established**, with the main focus of addressing horizontal issues and operational challenges of law enforcement authorities in the area of the fight against corruption. The group started its activities on 10 September 2025, first meeting was held on 25 November 2025.

Recommendation 5 - Strengthen the rules and mechanisms to restore and further safeguard the independent governance and editorial independence of public service media taking into account European standards on public service media."

Ministry of Culture of the Slovak Republic: The amendment to the Media services Act (MSA) effective from November 1, 2025, entrusted the competence to monitor and analyze compliance with the guarantees of the independent functioning of the public broadcaster to the Media Services Council.

Recommendation 6 - Advance with the process to establish legislative and other safeguards to improve the physical safety and working environment of journalists, including the reform of defamation law, taking into account the European standards on the protection of journalists.

Ministry of Culture: In 2025, the missing members of the national Platform for the Promotion of Press Freedom and the Protection of Journalists were added. In the previous monitoring period, the Platform temporarily did not carry out its activities due to personnel reasons that prevented it reaching necessary quorum. In 2025, an agreement was reached with the members of the Platform to continue its activities and supplement the nominations. Currently, the Platform is working on a new work plan as well as a website that will make available basic documents for the protection of journalists, journalistic standards and activities within the framework of the Council of Europe campaign to protect journalists.

In 2025, a draft methodology for the Police procedure was developed for the purpose of protecting journalists at risky mass events; in accordance with the fulfillment of task 4.4.2 of the Strategy for the Prevention of Crime and Other Antisocial Activities in the Slovak

Republic until 2028. The document in question is to be presented to the Platform for the Support of Freedom of the Press and the Protection of Journalists. Decision on its adoption by the competent authority is expected to take place during 2026.

Also in 2025, the Slovak Police Force developed the Principles of Sensitive Media Reporting on Cases of Violent Extremism. The document has the character of a recommendation and is intended to contribute to ethical reporting and the safety of journalists in the event of and reporting on terrorist attacks. The material in question is to be presented to the Platform for the Promotion of Press Freedom and the Protection of Journalists. Decision on its adoption by the competent authority is expected to take place during 2026.

In connection with the resumption of the platform's activities in 2026, a functional mechanism for monitoring attacks on journalists and crimes against journalists should also be proposed and submitted to the Slovak Government Council for Crime Prevention.

The decision of the Slovak Government of September 2025 set the task of mapping and developing an implementation plan and setting up a system for monitoring and evaluating the implementation of existing recommendations to increase the safety of journalists and other media workers in the EU by the end of May 2026.

The decision of the Slovak government of September 2025 set the task of developing a Strategic plan for the implementation of the Council of Europe recommendation on SLAPP lawsuits, which seek to prevent the participation of the public, especially journalists, in informing about matters of public interest, by the end of May 2026.

<u>Ministry of Justice:</u> The transposition of the anti-SLAPP directive is on the way. The draft law is expected to be submitted to the meeting of the Government for the approval in first quarter 2026.

(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.*

Ministry of Justice would like to point out that, in the case of individual areas monitored by the report, the relevant legislation adopted (or draft legislation introduced) in 2025 is mentioned in the respective parts of the questionnaire.
At the end of the questionnaire, we list other legislation (or draft legislation) with a possible impact on the rule of law, but which is not specifically related to any individual area of the questionnaire.

I. Justice Systems

A. Independence

Q 1 Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)
Q 2 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)
Q 3 Promotion of judges and prosecutors (incl. judicial review)
Q 4 Allocation of cases in courts
Q 6 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)

GPO: Appointment, selection, promotion liability of prosecutors – without changes

Ministry of Justice: ***Act No. 270/2025 Coll. amending Act No. 385/2000 Coll. on judges and lay judges and on amendments to certain acts, as amended, and amending certain acts, some parts of the Act became effective from 1 November 2025, obligations of the Judicial Council as regards databases for the disciplinary senates became effective from 1 January 2026 and the new system of disciplinary senates will become effective from 1 February 2025***

a) Unification of the length of legal practice required for the transfer of judges to higher courts in the case of general courts and administrative courts a new transfer to an administrative court is possible after 10 years of legal practice (previously 7 years) , and to the Supreme Administrative Court after 15 years (originally 10 years).
b) As part of career advancement, psychological assessments are no longer a mandatory part of the selection process
c) extension of the possibility of using visiting judges to regional courts and administrative courts
d) introduction of a functional allowance for serving as a member of the disciplinary senate
e) As part of career advancement, psychological assessments are no longer a mandatory part of the selection process
f) In the area of disciplinary proceedings, the principle of appeal is strengthened in the sense that appeals against any decision of the disciplinary senate are admissible; at the same time, senate hearing and deciding in the first instance consist of three members and senate hearing and deciding on appeals consists of five members and that the role of judges from general and administrative courts is strengthened. A condition of 10 years' service in the relevant position is also introduced for the appointment of a judge to the disciplinary senate or to the five-member senate.
g) The functioning of district courts is changed so that two judges instead of three are sufficient to establish a district court with its own jurisdiction

Act No. 319/2025 Coll. amending Act No. 314/2018 Coll. on the Constitutional Court of the Slovak Republic and on amendments to certain acts, as amended, effective from 1 December 2025
The requirement for regular replacement of all senates of the Constitutional Court is repealed.

As regards the vacant position of the judge of the Constitutional Court, president of the National Council of the Slovak Republic on 9 January 2026 announced the election of candidates for judge of the Constitutional Court of the Slovak Republic. Nominations for candidates must be submitted to the Constitutional Committee of the National Council of the Slovak Republic by March 27, 2026, so that the election can take place at the National Council meeting beginning on May 26, 2026.

Q 6 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)

The Supreme Administrative Court of the Slovak Republic (hereafter "Supreme Administrative Court") has the competence to decide on the **disciplinary liability of judges, prosecutors, notaries and bailiffs**. For more information on competence of the Supreme Administrative Court see points 51 – 52 of 3rd edition of the Rule of Law report.

Statistics of the Supreme Administrative Court (2025)
Total numbers of new disciplinary proceedings (judges and prosecutors): **16**

- 13 judges
- 3 prosecutors

Number of decided cases: 30 (12 judges and 4 prosecutors)
Number of decided appeals: 4 (all rejected)

Disciplinary measures imposed in 2025

1. Written warnings: 1
2. Temporary suspensions of the function: 0
3. Dismissal from office: 0
4. Temporary reduction of salary: 6

Motions rejected (including motions of temporary suspension of the function)/acquitted: 3
Terminated proceedings: 5

In one case a judge was pleaded guilty but no disciplinary measure was imposed.

GPO: Data on disciplinary and criminal liability of prosecutors
Three disciplinary proceedings were initiated in 2025:

1/ The first for a serious disciplinary offence under Section 188 Subsection 1 letter a) Subsection 2 of Act No. 154/2001 Coll. on Prosecutors and Legal Trainees of the Prosecutor's Office, as amended (hereinafter referred to as the "Act"), for which the applicant proposed to impose a disciplinary measure pursuant to Section 189 Subsection 2 letter d) of the Act, namely the dismissal from prosecutor's office. According to the proposal, the prosecutor culpably failed to fulfil and violated the basic duties of a prosecutor specified in Section 26 Subsection 1 letters a), c), f) of the Act (the inspection activity focused on the quality and speed of the proceedings revealed serious long-term persistent deficiencies in his work - he was repeatedly inactive, had unjustified delays in the proceedings, did not comply with measures of a short-term or long-term nature and also did not respond to requests or urgent requests from superiors). According to the applicant, the prosecutor committed a total of 30 acts. Based on this proposal, the disciplinary court imposed a disciplinary measure on him - a reduction in his basic salary by 50% for one year. The decision has not yet entered into force.

2/ The second proceeding was for a disciplinary offence under Section 188, Subsection 1, letter a) of the Act, for which the applicant proposed imposing a disciplinary measure under Section 189, Subsection 1, letter b) of the Act - a reduction in his basic salary by 5% for three months. According to the proposal, the prosecutor who was subject to disciplinary proceedings in a specific criminal case involving an accused juvenile, culpably violated the prosecutor's duties specified in Section 26, Subsection 1, letter a), b), c) of the Act, when as a prosecutor - a specialist in juvenile and minor criminal activity, crimes against human dignity, crimes committed against children and domestic violence, he committed procedural errors when he insufficiently assessed the time available to carry out the necessary actions, in particular the questioning of the accused juvenile. At the same time, he failed to fulfil the prosecutor's obligation specified in the internal regulations of the prosecutor's office, since he did not immediately forward the information from this criminal case to the prosecutor active in the non-criminal section, he insufficiently assessed the risks of continuing criminal activity in the event of the offender's release and he also did not participate in the questioning of minor witnesses. Based on this proposal, the disciplinary court imposed a disciplinary measure on him - **a written reprimand**. The decision entered into force on 30.10.2025.

3/ Third proceeding was for a serious disciplinary offence under Section 188 Subsection 1 letter a), Subsection 2 of the Act, for which the applicant proposed to impose a disciplinary measure pursuant to Section 189 Subsection 2 letter a) of the Act – a reduction of the basic salary by 15% for three months. According to the disciplinary proposal, the prosecutor, in a total of 27 acts, culpably violated the prosecutor's obligation specified in Section 26 Subsection 1 letter a), c) of the Act – he was repeatedly inactive, had unjustified delays in the proceedings when deciding on complaints, motions for indictment and also in custody cases and did not comply with the measures adopted by the regional prosecutor. The court acting in the disciplinary case has not yet ruled.

In addition to the above-mentioned disciplinary proceedings, which have not yet been legally terminated, two disciplinary proceedings are currently underway, initiated on the basis of previously filed disciplinary proposals from the previous period, in which the original disciplinary commissions established at the Prosecutor General's Office of the Slovak Republic are acting.

In 2025, the Prosecutor General of the Slovak Republic did not decide in any case on the temporary suspension of the performance of the function of a prosecutor due to criminal prosecution for an intentional crime, or disciplinary prosecution for an act for which the prosecutor may be dismissed from the function of a prosecutor.

Currently, **four** prosecutors have their function of prosecutor temporarily suspended on the basis of criminal prosecution from the previous period, which have not been effectively terminated. All prosecutors have their function temporarily suspended until the criminal prosecution is effectively terminated.

During the temporary suspension of the prosecutor's service, the Prosecutor General shall assess the justification for the further duration of the temporary suspension. However, the duration of the temporary suspension of the prosecutor's service, which is a significant interference with the rights of the prosecutor, cannot be assessed in separately from the stage of the criminal proceedings, their duration and the progress of the authorities involved in criminal proceedings in the proceeding against the prosecutor. For the above reasons, the Prosecutor General of the Slovak Republic in 2025, decided in **three** cases to cancel the further duration of the temporary suspension of the prosecutor's office. The reason was essentially the unreasonable length of the criminal proceedings without the prosecutor's fault.

7. Independence/autonomy of the prosecution service

GPO: **Cassation power of the Prosecutor General of the Slovak Republic in proceedings pursuant to Section 363, Paragraph 1 et seq. of the CCP**

According to the statistical data completed so far, in the evaluated period of the calendar year 2025, a total of 656 criminal cases were kept in the individual material registers of the institute of annulment of final decisions in preliminary proceedings **pursuant to Section 363, Subsection 1 et seq. of the Criminal Procedure Code (IV/1 Pz, IV/2 Pz and IV/3 Pz) at the General Prosecutor's Office of the Slovak Republic (hereinafter referred to as the "General Prosecutor's Office") in which a proposal was submitted by an authorized person, or a motion by another subject** of criminal proceedings to exercise the extraordinary cassation competence of the Prosecutor General of the Slovak Republic (hereinafter referred to as the "Prosecutor General") in proceedings under the first section of the eighth chapter of the third part of the Criminal Procedure Code, or in which such a procedure was implemented by the Prosecutor General without a motion (i.e. in the *ex officio* regime) following the finding of a violation of the law.

In accordance with the long-term trend, the primary subject of the review obligation in the extraordinary corrective period and in the evaluated period of the calendar year 2025 were resolutions on the filing of charges, in connection with the amendment of the substantive law by Act No. 40/2024 Coll. with effect from 06.08.2024 (especially in the context of its direct or indirect impact on the length of the limitation periods of criminal prosecution), but, also to a significant extent, resolutions on the suspension of criminal prosecution of a specific accused natural or legal person due to its inadmissibility due to the statute of limitations.

Primarily on the basis of submitted motions (prevalently directed against the resolution pursuant to Section 206, Subsection 1 of the Criminal Procedure Code), in minority cases also ex officio (mainly in relation to resolutions to discontinue criminal prosecution due to statute of limitations), **the Prosecutor General exercised his extraordinary cassation power in 2025 with 110 resolutions, of which only 18 decisions had a direct impact on the resolution to bring charges.**

On the contrary, without accepting a motion or an initiative to annul a final decision, in 2025, the Prosecutor General **disposed of more than 400 matters** in proceedings pursuant to Section 363, Subsection 1 et seq. of the Criminal Procedure Code, **primarily due to the failure to establish grounds for annulment of the contested final decision, and occasionally also due to the expiry of the statutory period or due to the submission of a motion by an unauthorized entity.**

In criminal matters, the subject of which was the investigation of an act legally qualified as one of the **corruption criminal offences, the Prosecutor General issued a total of 2 annulling resolutions in proceedings pursuant to Section 363, Subsection 1 et seq.** of the Criminal Procedure Code in the evaluated period of the calendar year 2025, consistently adhering to one of the basic principles of criminal proceedings pursuant to Section 2, Subsection 22 of the Criminal Procedure Code (to ensure proper protection of the financial interests of the European Union in criminal proceedings).

The subject of the cassation of the aforementioned decisions was **in both cases** the resolution of the supervising prosecutor to discontinue the criminal prosecution of specific natural persons due to its **inadmissibility due to the statute of limitations**. The criminal prosecutions were conducted for various qualifying variants of the criminal offence of bribery pursuant to Section 333 of the Criminal Code, where the bribes were each allegedly provided by the perpetrators to public officials operating in the structures of the Financial Administration of the Slovak Republic in connection with the procurement of a matter of general interest in the form of ensuring the smooth payment of unduly claimed claims for the refund of value added tax (hereinafter referred to as "VAT") to several tax entities in significant amounts, i.e. with a direct factual impact (also) on the financial interests of the European Union.

The reason for concluding that the law was violated to the extent that it justifies the application of extraordinary cassation intervention pursuant to the above-mentioned legal provisions, was **the retroactive neutralization (negation of preservation or cancellation) of the substantive temporal effect of the procedural act causing the interruption of the limitation period** in the form of bringing charges against natural persons prosecuted for a serious criminal offence damaging the financial interests of the European Union pursuant to the provisions of Section 87, Subsection 3, letter a), Subsection 4 of the Criminal Code (effective from 06.08.2024), which, when applying the principle of *lex mitior* pursuant to Section 2, Subsection 1 of the Criminal Code (effective from 06.08.2024), was interpreted and applied by the supervising prosecutors in conflict with the binding interpretation of the reference Article 325, Paragraph 1 of the Treaty on the Functioning of the European Union and Article 2, Paragraph 1 of the Convention done on the basis of Article K.3 of the Treaty on European Union on the protection of the European Communities' financial interests (hereinafter referred to as the "PIF Convention"), as set out in the **judgment of the Court of Justice of the European Union of 24 July 2023 in Case C-107/23 (PPU [Lin]).**

From the aforementioned judgment of the Court of Justice of the European Union, the Prosecutor General concluded that it was imperative to interpret the provision of Section 87 Subsection 3 letter a), Subsection 4 of the Criminal Code (effective from 06.08.2024) so that, if all the statutory prerequisites by which the then effective substantive law conditioned the onset of the interrupting effect of the filing of charges (e.g. with regard to the timeliness of the performance of the procedural act from the point of view of the ongoing limitation period) at the time of application of the procedure under Section 206 Subsection 1 of the Criminal Code for serious fraud detrimental to the financial interests of the European Union prosecuted, such effect of the aforementioned procedure remains intact even after any later modification of the relevant normative regulation (e.g. reflected in the direct or indirect shortening of the limitation periods for criminal prosecution).

The seriousness of the fraud affecting the financial interests of the European Union was not assessed in the criminal matters concerned in accordance with the provisions of the Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud affecting the Union's financial interests by means of criminal law (hereinafter referred to as the "PIF Directive"), as these were always acts committed before its entry into force (05.07.2019), to which, for the aforementioned reason, a legally binding act of secondary European Union law is not applicable according to the case law of the Court of

Justice of the European Union, but in accordance with the provisions of another legal instrument of EU law, which the PIF Directive has since replaced, namely the PIF Convention.

For the same reason, in the evaluated period of the calendar year 2025, the Prosecutor General also revoked another 20 resolutions of supervising prosecutors to discontinue criminal prosecution of specific natural and legal persons due to its inadmissibility due to the statute of limitations, namely in criminal matters conducted for acts legally qualified as the crime of tax and insurance evasion pursuant to Section 276 of the Criminal Code, or as the crime of tax fraud pursuant to Section 277a of the Criminal Code, each time with a criminally relevant consequence caused not only in the area of national financial interests, but also indirectly in the area of financial interests of the European Union - due to the loss of the European Union's own financing resources resulting from the application of a single rate to the harmonized VAT assessment base. **This was the procedure in relation to tax crimes related to VAT in cases where their extent exceeded the amount of EUR 50,000, or in which any of the statutory features of their qualified facts were fulfilled (as circumstances conditioning the application of a higher penalty rate).**

The procedural consequence of issuing the discussed annulling resolutions of the Prosecutor General is **the resumption of criminal prosecution of specific natural and legal persons for serious crimes (fraud and bribery) damaging the financial interests of the European Union in the pre-trial phase of criminal proceedings.**

Q 8 Independence of the Bar (chamber/association of lawyers) and of lawyers

Ministry of Justice: The Slovak Republic, recognising the importance of the protection of lawyers´ independence, launched an internal process for signing the Council of Europe Convention on the protection of the profession of lawyer. We did not sign the Convention during the official signing ceremony due to a need for clarification regarding the application of EU competences vis-à-vis this Convention (missing proposal for a Council decision on signature/ratification).

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

Slovak Bar Association provides training to its members on voluntary basis (qualified lawyers) and mandatory basis (trainee lawyers). Lawyers can undertake additional training choosing from among private providers depending on their area of expertise.
In 2025 the Bar organised 87 regular training events for 4270 participants (excluding events organised with external and foreign partners).
Slovak Bar Association organises regular weekly hybrid training events for lawyers, two annual two-day seminars, ad hoc seminars and several seminars initiated by regional representatives in regional towns.
Trainee lawyers must undertake mandatory seminar in ethics and four mandatory two-day seminars a year – theory and practice – with a follow-up practical seminars organised for small groups.
Slovak Bar Association has been involved in several training projects on EU law co-organised with its partners:

- Cooperation with Council of Europe as a partner in the HELP (Human Rights Education for Legal Practitioners) Programme, including the HELP in the EU IV.
- Cooperation with Academy of European Law (ERA) in organising and implementing Young European Lawyers Project – Contest (EU law and networking-oriented) and Academy (intensive training in EU law coordinated by ERA and focusing on trainee lawyers).
- Cooperation with European Lawyers Foundation (ELF) in implementing project on internships of young lawyers - LAWYEREX II, promoting ELF webinars on EU law and implementing the TRADICIL project.

Cooperation with Council of Bars and Law Societies in Europe (CCBE) when appointing participants to international and cross-border training events

B: Quality of Justice

Q 10 Accessibility of courts (e.g. court/legal fees, legal aid, language)

Ministry of Justice:

Act No. 98/2025 Coll., amending Act No. 327/2005 Coll. on the provision of legal aid to persons in material need and amending Act No. 586/2003 Coll. on advocacy and amending and supplementing Act No. 455/1991 Coll. on small business (Small Business Act), as amended by later regulations, as amended by Act No. 8/2005 Coll., as amended by later regulations, and amending and supplementing certain acts, effective from 1 July 2025

- The basic objective of the Act is, in particular, to regulate the rules of access to legal aid so that it is available to the widest possible range of natural persons, to respond to the current increased need to address the situation of defectors, and at the same time to respond to the current findings from practical application and the current economic-social situation in the Slovak Republic
- of the law also contributes to reducing the administrative burden on the centre's employees and motivating them
- the thresholds for material need for entitlement to legal aid are increased, the circle of eligible persons is expanded, the introduction of the possibility to waive the fee for preliminary consultation and the setting of a maximum upper limit for the financial contribution of the eligible person to the provision of legal aid, which will result in free legal aid becoming more accessible to a larger number of people who currently cannot afford legal aid
- an amendment is also being introduced to remove the administrative burden in legal aid proceedings and facilitate communication with the entities concerned, in particular designated lawyers and mediators
- The fee for a preliminary consultation (including a preliminary consultation on personal bankruptcy) is increased from €4.50 to €6, and at the same time an administrative fee is introduced for processing applications for legal aid in debt relief proceedings. This legal amendment responds to the current economic situation and also to practical application.
- Lawyers from the Legal Aid Centre are becoming the target group for training at the Judicial Academy.

Q 11 Resources of the judiciary (human/financial/material[6]), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

Ministry of Justice: **Act No. 270/2025 Coll. amending Act No. 385/2000 Coll. on judges and lay judges and on amendments to certain acts, as amended, and amending certain acts, effective from 1 November 2025**

- introduction of rewards for judges on the occasion of a milestone birthday (50 and 60 years). The president of the court decides on the award of remuneration.

No further legislative changes were adopted in 2025 with an impact on the court budget (budget excluding IT services):

- 2021 = EUR 260,526,278
- 2022 = EUR 265,762,068
- 2023 = EUR 287,832,057
- 2024 = EUR 297,058,917
- 2025 = EUR 341,059,729

• Salaries and social and health insurance of judges and employees constitute the main part of these expenses. Salaries of court employees were increased per person per month by EUR 400 in courts outside Bratislava and by EUR 500 in courts in Bratislava (approved by a resolution of the Slovak Government).

• Expenditure on legal proceedings (expenditure on lawyers, experts, notaries, bailiffs, interpreters, translators, witnesses and assessors) represents approximately half of expenditure on goods and services.

Number of Judges (18/12/2025)			
Court	**Total number of Judges**	**Men**	**Women**
Regional Courts and Specialized Criminal Court	400	161	239
District Courts and Municipal Courts	833	303	530
Administrative Courts	75	30	45
Total	**1 308**	**494**	**814**

Number of employees at Regional Courts, District Courts, Municipal Courts, Administrative Courts and Specialised Criminal Court (18/12/2025)		
Function		**Number of employees**
Performance of	Assistants	1 269
	Judicial Secretary	686

[6] Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.

	Higher Court Official	1 176
Other staff at general judicial department		440
Judicial treasury		58
Administration and management staff		951
Total		**4 580**

GPO:

b) Human resources

Staff of the Prosecutor's Office of the Slovak Republic as of 31 December 2025				
	Prosecutors (men/women)	**Prosecutors' Assistants (men/women)**	**Prosecutor Trainees (men/women)**	**Employees categories (men/womer**
District Prosecutor's Office (number)	309/372	0/0	16/19	75/408
Regional Prosecutor's Office (8)	126/106	1/3	0/0	62/186
General Prosecutor's Office (Special Prosecutor's Office included)	64/54	2/1	0/0	49/118
Prosecutor's Office of the Slovak Republic in Total	499/532	3/4	16/19	186/712

c) Budget

The adjusted budget of the General Prosecutor's Office of the Slovak Republic as of 30.09.2025 was 158,789,799 euros. For the I. – III. quarters 2025, the annual expenditure limit was used in the amount of 104,992,493 euros and represents 66,1% of the adjusted limit. The revenue budget was used in the I. – III. quarters of 2025 in the amount of 552,365 euros; the revenue budget was utilized at 138,1%.

The current expenditure disbursed in the I. – III. quarters of 2025 were in the amount of 103,573,055 euros. The most significant share of their use was made up of wages, salaries, employment income and other personnel expenses in the amount of 62,675,958 euros. Of the annual capital expenditure limit of 4,876,237 euros, 1,419, 438 euros was spent in the I. – III. quarters of 2025.

Overview of expenses:

	Year 2022	**Year 2023**	**Year 2024**	**Year 2025 (to 30.9.2025)**	**% (2025/2024)**
Total expenses	**126 626 518**	**139 600 248**	**152 940 343**	**104 992 493**	**68,65**

A. Regular expenses	**121 513 235**	**133 711 016**	**147 398 761**	**103 573 055**	**70,27**
Out of which:					
Wages, salaries, employment income and other personnel expenses	75 057 268	82 808 112	90 436 572	62 675 958	69,30
Insurance contributions	24 582 180	26 935 861	30 315 899	21 488 227	70,88
Goods and services	15 216 658	16 586 454	17 185 104	12 680 856	73,79
Regular Transfers	6 657 129	7 380 589	9 461 186	6 728 014	71,11
B. Capital expenses	**5 113 283**	**5 889 232**	**5 541 582**	**1 419 438**	**25,61**

The average salary of a prosecutor in subordinate organizations was 5,634 euros at the regional prosecutor's offices and 6,661 euros in the General Prosecutor's Office of the Slovak Republic.

A total amount of 645,853 euros were paid for overtime pay, 104,713 euros for additional payments for work on Saturdays, Sundays, bank holidays and at night, and 1,822,979 euros for compensation for prosecutors on call duty.

Of the annual limit of the capital expenditures in the amount of 4,876,237 euros 1,419,438 euros were used in the I. – III. quarters of 2025. The budgetary funds in the amount of 958,894 euros were used for the 06R program, and 460,544 euros were used for the 0EK program.

Capital expenditure disbursements according to economic classification items as of 30.09.2025:

Entry	Investment project name	Drawdown in EUR
711	**Purchase of land and intangible assets**	0
712	**Purchase of buildings, objects or their parts**	0
713	**Purchase of machinery, devices, equipment, technology and tools**	494 482
714	**Purchase of means of transport**	0
716	**Preparatory and project documentation**	12 180
717	**Implementation of buildings and their technical evaluation**	901 894
718	**Reconstruction and modernization**	10 882
Total capital expenses		1 419 438
Out of which		
06R		958 894

0EK		460 544

The financial funds were used for the upgrade of the telephone exchange for the General Prosecutor's Office of the Slovak Republic and for Regional Prosecutor's Office in Trnava. A shelving system was purchased for the District Prosecutor's Office Michalovce and CCTV for District Prosecutor's Office Prievidza and Regional Prosecutor's Office Košice. **Project documentations have been completed** for Regional Prosecutor's Office Bratislava, Regional Prosecutor's Office Košice, General Prosecutor's Office of the Slovak Republic, District Prosecutor's Office Košice II and Regional Prosecutor's Office Bratislava. A testing environment was built in connection with the new Information system for the General Prosecutor's Office of the Slovak Republic. The building of District Prosecutor's Office Humenné was has been refurbished, t**he installation of air conditioning has been completed in the building of District Prosecutor's Office Ko**šice II as well as in the premises in Špitálska Street for the General Prosecutor's Office of the Slovak Republic, t**he roof has been renovated** in Hanulova Street. The District Prosecutor's Office Dunajská Streda was insulated and the facade on the building was restored.

Q 12 Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

Ministry of Justice of the Slovak Republic: **Act No. 319/2025 Coll. amending Act No. 314/2018 Coll. on the Constitutional Court of the Slovak Republic and on amendments to certain acts, as amended, effective from 1 December 2025**
The qualification requirement of five years' experience for the position of judicial advisor is waived.

Act No. 158/2025 Coll. amending Act No. 548/2003 Coll. on the Judicial Academy and on amendments to certain acts, as amended, effective from 1 August 2025.

- The Council of the Judicial Academy is expanded to include representatives nominated by law faculties of public universities and professional organisations of lawyers, notaries and bailiffs (Slovak Bar Association, Notary Chamber of the Slovak Republic, Slovak Chamber of Bailiffs).
- a selection procedure is opened for the position of director and deputy director of the Judicial Academy, also from outside the judiciary and other interested parties who are recognised figures in the field of education
- The requirements and qualification criteria for the position of director of the academy are being increased.
- The forms of cooperation between the Academy and public universities are being adjusted, as is the financial contribution that supports this cooperation.
- The scope of activities of the Judicial Academy, the target groups for education, and the procedure for conducting the professional judicial examination are specified in line with the requirements of practical application, thereby addressing some of the related legal and organisational problems that have arisen from the current legislation and its application

In 2025, Judicial Academy organized totally 154 trainings in various forms, 58 % of trainings were face-to-face activities in our premises in Pezinok and in Omšenie. We continued our cooperation with Regional court in Košice. Next almost 40 % were online trainings via the ZOOM video conferencing application. The fact the online training is more available to the target group benefitted to higher number of participants. The rest of the trainings were hybrid trainings. Following the European judicial training strategy, the Academy considered the necessity to modernize technical equipment for trainings. By the financial help of the Ministry of Justice in 2022, Academy bought the special system and technology for hybrid trainings, trainings combining present and distant participation of target group. Actual number of such hybrid trainings are lower than previous year, but we expect to higher the number next year due to adapting the topics to such a form.

From the total number of participants for the last year, there is a noticeable increase in the participation of the judges, prosecutors, mostly related to the offered forms of education. Currently, the average participation of the primary target group is at the level of 42% and still growing. Secondary target group, representing employees of courts and prosecutor's offices, or other professions within the justice system is actually at the level 52%. This relates to the real numbers of individual professions and to the scope of workload. According to our agreements on cooperation, we also opened some specific trainings to other legal professionals who are not part of judicial employees according to Law on Judicial Academy, but their work have impact on proceedings, hearings and / or making judgements. They represent 5 % of total number of participants this year, which is lower comparing to 2024.

The Judicial Academy has been providing language education in three languages for a long time - English, French and German, as specialized education in a legal terminology in three-day and five-day courses. In 2025, we organized two online courses in German legal terminology in the format of one class weekly during 10 weeks, in total 20 weeks for 25 participants. In cooperation with French Institute Academy organized online course in French legal terminology for two groups (level B1 and level B2), which lasted 15 weeks and 18 judges and prosecutor participated on this course. We prepare the same type of courses in other languages for next year, partly following the format of the courses we organized in 2020-2022 and partly inspired by EJTN format of language online courses.

Judicial Academy also extended the e-learning to initial trainings to follow the plan of trainings and mandatory education. We provided the audio and video lectures for new trainees in prosecutors´ offices and for all candidates who were preparing for the judicial exams. Target group positively appreciated E-learning and because of that, we would like to continue with e-learning in these types of education in the future. E-learning is also supported by the virtual library in which all users of the portal can access selected audio and video recordings from real activities. This video and audio library is aimed to strengthen using digital tools in learning in Slovakia. The video library contains approximately 507 recordings from thematically different trainings. Statistically, we registered more than 672 viewed / listened recordings during last year.

Currently, interdisciplinary trainings or trainings focusing on improving soft skills have the largest number in the online education, we also added specialized topics to online form, because of their relevancy across the whole judiciary. The training of professional skills as well as the development of the practical side of performing the duties of a judge or prosecutor continue to be carried out exclusively in person.

GPO: Beyond the scope of the provided professional training at the level of the Judicial Academy (documents of the Ministry of Justice of the Slovak Republic), we present a brief assessment of the Training and Education Plan of the Prosecutor's Office of the Slovak Republic for 2025:

The draft Training and Education Plan of the Prosecutor's Office of the Slovak Republic for 2025 /hereinafter referred to as the "Plan"/ was approved by the Prosecutor General of the Slovak Republic on 28 November 2025. The Plan contains all working meetings and educational events /hereinafter referred to as "work activities"/ that will take place in the relevant year. National work activities are held annually in the Educational and Rehabilitation Centre of the Prosecutor's Office of the Slovak Republic in Krpáčovo and in the Educational and Rehabilitation Centre of the Prosecutor's Office of the Slovak Republic in Stará Lesná. The coordinator of the working meetings is the chief prosecutor, prosecutor or senior civil servant of the relevant organizational unit that initiated the work activity in the Plan.

Depending on the content, prosecutors, assistant prosecutors and civil servants participate in the work activities. In 2025, according to the Professional Training and Education Plan of the Prosecutor's Office of the Slovak Republic for 2025, 33 nationwide work activities were held.

The work activities were focused on:
- on application problems in the area of drug crime,
- on detecting and proving crimes of corruption, damaging the financial interests of the European Union and solving application problems in the context of the latest amendment to the Criminal Code and the Criminal Procedure Code,
- on the criminal activity of terrorism, including related international cooperation,
- on the criminal activity of juveniles and minors, crimes committed against children and violence in families,
- on issues of legal relations with foreign countries, international judicial cooperation in criminal matters,
- on crimes against the environment,
- on the non-criminal area related to current problems of the exercise of the powers of the prosecutor's office in the non-criminal area,
- on problems related to cybersecurity,
- on the economic area, drawing the budget, current issues regarding wages, drawing expenses,
- on the area of registry administration, management registers,
- on occupational health and safety and others.

613 prosecutors and 197 civil servants of the prosecutor's office participated in them.
In addition to nationwide work activities, the Plan also includes work activities of regional prosecutor's offices, dates of meetings of the Council of Prosecutors of the Slovak Republic, the Ethics Commission of the Prosecutor's Office, etc.

Q 13 Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)

Ministry of Justice:

I. **Act No. 240/2025 Coll. amending Act No. 7/2005 Coll. on Bankruptcy and Restructuring and on Amendments to Certain Acts, as amended, and on Amendments to Certain Acts, effective from 1 October 2025**

- streamlining insolvency proceedings by removing certain administrative obligations and, at the same time, addressing current application issues
- responding to current practical needs and removing application ambiguities, as well as certain interpretative inconsistencies across insolvency law
- clarifying the regulation with regard to the functionality of the register of pre-insolvency, liquidation and insolvency proceedings.
- The regulation of contractual penalties is expanded, and the administrative burden of proving additional creditors in the event of anticipated bankruptcy in the case of a creditor's petition for bankruptcy is removed.
- The small bankruptcy process is being amended.
- removes certain administrative requirements, such as the certification of signatures, regulates the composition and voting of the creditors' committee, clarifies the legal regulation of the replacement of the administrator and also clarifies irregularities in the appointment of the administrator in the event of conversion of restructuring to bankruptcy
- Amendments are made to simplify the submission of a restructuring plan.

The insolvency register replaced the bankrupts register information system. The Insolvency Register is a public administration information system administered and technically operated by the Ministry of Justice of the Slovak Republic. This information system was created on the basis of the implementation of the Recovery and Resilience Plan, under milestone No. 14 – Improving the business environment, specifically through the implementation of investment No. 2: Digitization of insolvency proceedings.

The following are recorded in the insolvency register:

- data on bankruptcy proceedings and events that occurred in bankruptcy proceedings from the issuance of the resolution to commence bankruptcy proceedings until its completion. In the case of small bankruptcy, data on bankruptcy proceedings and events that occurred in bankruptcy proceedings from the issuance of the resolution to declare small bankruptcy until its completion,
- information on restructuring proceedings and events that occurred in the restructuring proceedings from the issuance of the resolution to commence restructuring proceedings until their termination,
- information on debt relief proceedings and events that occurred in debt relief proceedings from the issuance of a bankruptcy order or a decision to grant protection from creditors to the debtor until the proceedings were terminated, including data on the commencement of proceedings to revoke debt relief for dishonest intent and decisions to revoke debt relief for dishonest intent,
- information on public preventive restructuring and events that occurred in public preventive restructuring from the issuance of the resolution on the approval of public preventive restructuring until its termination, including a statement by the debtor's statutory body that it is not in bankruptcy under a special regulation,
- information on liquidation and additional liquidation from the issuance of the court resolution appointing the liquidator until its completion,
- other information on proceedings and events in proceedings.

Data published in the insolvency register does not need to be proven before public authorities or in business transactions. Published data is structured in a way that allows for searching and automated processing.

The content of electronic documents of participants in proceedings and other persons in bankruptcy proceedings, restructuring proceedings, debt relief proceedings, public preventive restructuring or liquidation or additional liquidation in which the liquidator was appointed by the court is published in the insolvency register if the events arising on the basis of or in connection with them are recorded in the insolvency register, or if the electronic document contains data recorded in the insolvency register.

The insolvency register also serves as a publication platform on which, with effect from October 1, 2025, notices and other disclosures relating to insolvency proceedings, pre-insolvency proceedings, and liquidations will be published. In this context, the above-mentioned notices and other disclosures will no longer be published in the relevant chapters of the Commercial Gazette. An exception is made for notices and other disclosures related to bankruptcies and settlements under Act No. 328/1991 Coll. on Bankruptcy and Settlement, as amended, which will continue to be published in the Commercial Gazette, in the chapter "Bankruptcies and Settlements."

II. Since December 2025, Ministry of Justice of the Slovak Republic has been operating a digital information system that provides judges with centralized, secure, and transparent access to professional materials necessary for their decision-making in court proceedings (legal analyses, research, case law, etc.).

The platform functions as a unified repository of analytical outputs generated at selected courts and was created with the aim of streamlining the work of judges in processing files and making decisions. The platform speeds up the study of files in terms of legal research, searching for relevant case law, and analyzing legal opinions.
Judges have gained access to analytical outputs, research, and model justifications in one place, significantly reducing the time needed to orient themselves in the legal issues of a case. At the same time, the professional quality of the supporting documents is improved, as the analytical materials are prepared by experts at individual courts, are consistent in content, and reflect current case law. The platform also provides judges with easy access to the decisions and analyses of their colleagues, which naturally promotes the horizontal sharing of experience and professional practice. Such interconnection helps to prevent inconsistent decision-making and at the same time strengthens confidence in the stability of the legal system.

The platform was created based on the implementation of the Recovery and Resilience Plan under Component 15, Investment 2: Support tools for judicial reform – digitization of tools, modernization of IT equipment, and analytical capacities.

III. Draft law on Commercial Register, LP/2025/129, is at the moment in the first reading in the Parliament.

The aim of the draft law is to create a comprehensive substantive and procedural approach to the regulation of the commercial register so that most of the rules that are currently partially regulated in various legal regulations are concentrated in a single legal regulation. The bill is intended to contribute to reducing the administrative burden on entrepreneurs and commercial companies.
The draft law expands the possibilities for linking the commercial register with other registers, in particular reference registers, thereby reducing the number of administrative steps that registered persons will have to take vis-à-vis the registry court or registrar. Effective linking of the commercial register with other registers also supports the accuracy

and timeliness of data in the commercial register. The proposed technical solutions create the conditions for introducing the legal binding nature of data entered in the commercial register and published online. It will not be necessary to prove this data in business transactions or before public authorities, thus achieving the principle of "once and for all" and at the same time reducing the burden on the business environment through effective cooperation between public authorities.

A new feature introduced by the bill is the possibility to reserve a company name even before its establishment in order to enable the building of a business brand and identity.
The draft law maintains the legal regulation of duality of data entry into the commercial register through the registry court and the registrar – notary.

IV. Since June 2025, Slovak Republic is connected to and using the decentralised information system under the Regulation 2023/2844 and Regulations 2020/1783 and 2020/1784. Employees of the Ministry of Justice of the Slovak Republic conducted training for the judges and other legal practitioners using the new communication system.

Statistics as of November 25, 2025:
a total of 225 applications received;
a total of 152 applications sent;

GPO:

(update)
Electronic investigation file - integration of information systems of the prosecutor's office and the police
During 2022 and also 2023, several meetings were held with representatives of the Ministry of the Interior of the Slovak Republic, the Prosecutor General's Office of the Slovak Republic and the Ministry of Justice of the Slovak Republic, with the aim to propose a legislative amendment to Decree No. 618/2005 Coll. on the creation of a file by criminal authorities and courts, and also defining the procedure in linking IS PATRICIA and IS MVS. The outcome of the above meetings was End to end testing of the integration between IS PATRICIA and IS MVS, which was successful, and verification of mutual processes in the test environment between the District Prosecutor's Office Pezinok and the Police Force District Directorate Pezinok. Subsequently, a pilot operation was to be launched between the above-mentioned components, within which electronic documents would be sent (so far only in PDF format, not in structured form), and at the same time documents would continue to be sent in paper form. However, technical and financial complications arose on the part of the Ministry of the Interior of the Slovak Republic, and therefore the launch of the pilot operation is being postponed for the time being. Several meetings were cancelled by the Ministry of Interior of the Slovak Republic due to delayed activities, and the planned meeting in January 2024 was also postponed indefinitely, as no significant progress was made on the part of the Ministry of Interior of the Slovak Republic.

The interconnection of information systems between IS PATRICIA - IS MVS - IS Court Management is currently not up to date.

eCodex, eEDES Platform

In 2022, GPO prepared the documents for the involvement of the Prosecutor's Office in the system for sending European Investigation Orders, requests for legal assistance and electronic evidence via the eCodex system using the e-Edes platform, which serves for the digital exchange of electronic evidence. In this regard, representatives of the GPO participated in a 2-day conference in Vienna, where, as part of informal discussions with representatives of the European Commission (“EC”), they discussed the possibilities of building and, in particular, refinancing the aforementioned system in the prosecutor's office environment. Subsequently, an online meeting was held with the participation of representatives of the IS supplier for the GPO, where the EC presented the system and how its individual components work. At the beginning of 2023, an online meeting was held on the topic of the possibilities of refinancing the building of the given system by the EC, which published the JUST-2023-JACC-EJUSTICE call allowing the provision of grants to support cross-border projects in the field of e-justice, the rights of injured parties and procedural rights. One of the conditions was to create a partnership with at least one competent authority of another EU Member State. In this regard, the GPO approached the Supreme State Prosecutor's Office in the Czech Republic, to which it received a positive response. Subsequently, a grant application was prepared in cooperation with an external supplier, which was submitted within the application deadline. In November 2024, the Grant Agreement was signed and the project implementation and realization phase will take place during 2025 and 2026.

GPO uses an internal reporting module that provides overviews, reports and statistical information from data available in GPO information systems. The basis is the data warehouse database (DWH), which contains appropriately transformed data from source systems. The DWH solution, as one of the ISGPO modules, was deployed as two separate instances, used separately for IS PATRICIA and separately for IS EOO. The DWH includes several aspects, whether it is basic data on the activities and workload of the prosecutor and the method of processing cases in court proceedings, proceedings on extraordinary remedies, supervision in places where detention is carried out, imprisonment, protective and institutional treatment, protective and institutional education, the state of crime prevention, transfer of criminal proceedings abroad and taking over criminal proceedings from abroad (including the transfer and taking over criminal complaints abroad and from abroad), international legal cooperation, recognition and extradition proceedings, European Arrest Warrant and international arrest warrant proceedings, overview of the status and methods of processing files according to individual registers, etc. At the end of 2024, the DWH was adjusted due to a legislative change (abolition of the Special Prosecutor’s Office). Other areas being regulated include expanded reporting by age and gender, the previously unaddressed area of legal entities, hours spent in court hearings, seizure of property, effective regret, etc.

In 2025, a test version of the eCODEX/eEDES system was implemented in the internal environment, because communication with the Czech Republic is not yet ready on the part of the Czech Republic.

Historically, the no longer supported Pentaho reporting tool has been used in GPO. Therefore, in 2025, a new version of the Pentaho reporting tool was installed, with the provision that in 2026, GPO reports will be upgraded to this new version of Pentaho.

Q 14 Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

Ministry of Justice: **Act No. 270/2025 Coll. amending Act No. 385/2000 Coll. on judges and lay judges and on amendments to certain acts, as amended, and amending certain acts, effective from 1 November 2025**

- New system for evaluating judges, as follows:

a) after the first five years of service as a judge,
b) in connection with a selection procedure for a vacant position of judge at a higher court; this shall not apply if the judge submits to the selection committee an evaluation of the judge not older than one year,
c) at the proposal of a person who is authorized to file a disciplinary proposal; in this case, the assessment period is the five-year period preceding the assessment or the period of service as a judge if the judge has been in office for less than five years,
d) if the judge requests an assessment,
e) after one year if the immediately preceding assessment of the judge was "unsatisfactory,"
f) after two years, if the immediately preceding evaluation of the judge concluded that the judge was "sufficient";
g) after five years, if the immediately preceding evaluation of the judge concluded that the judge was "good."

Q 16 Geographical distribution and number of courts/jurisdictions ("judicial map") and their specialisation

Ministry of Justice: **Act No. 189/2025 Coll. amending Act No. 265/2022 Coll. on publishers of publications and on the register in the field of media and audiovisual services and amending certain acts (Act on Publications) and amending and supplementing Act No. 264/2022 Coll. on Media Services and on Amendments and Supplements to Certain Acts (Act on Media Services), as amended, effective from 1 August 2025**
Introduction of the causal jurisdiction of three district courts: Municipal Court Bratislava IV, District Court Banská Bystrica and Municipal Court Košice, as regards the Right to correction and right to additional notification, if a false or incomplete factual statement has been published in a periodical publication or agency service that infringes on the honor, dignity, or privacy of a natural person or the good reputation of a legal entity, on the basis of which the person can be precisely identified.

GPO: **Information on the impact of the judicial map on the prosecution office of the Slovak Republic**
Measures taken (in 2025) and findings on the impact of the judicial map on the activities of the prosecution office

The implementation of the judicial map reform also brought a set of fundamental and heterogeneous, but mostly negative, impacts to the daily exercise of the legal competence of the prosecution of the Slovak Republic during the evaluated period of the calendar year 2025. These vary depending on the specific configuration of the new judicial districts and the degree of application of the so-called district system by individual courts.

From a global perspective, it can be stated that while in some regions, such as the district of the Regional Prosecutor's Office Banská Bystrica, the impacts are essentially minimal thanks to the consistent preservation of the original personnel structures at the workplaces of the courts; in the rest of the republic systemic barriers persist that negatively affect logistics, economics and the overall efficiency of prosecutorial activities.

The most extensive negative phenomenon is the increase in logistical complexity associated with the inefficient use of prosecutors' working time. Regional Prosecutors' Offices in Trnava, Trenčín, Nitra, Žilina, Prešov and Košice all point to significant time losses of prosecutors caused by their obligation to commute for acts of criminal proceedings in court outside their core service district. In the Prešov region, the reform primarily affected the district prosecutors' offices of Bardejov, Svidník, Poprad and Kežmarok. As a result of the random allocation of criminal matters within joint judicial districts, situations occur where the acts are performed alternately in the seats of the courts (Poprad, Bardejov) and in their remote workplaces (Kežmarok, Svidník). This requires constant transfers not only of prosecutors, but also of extensive case files, while judges generally do not take into account the seat of the relevant and local prosecutor's office when setting deadlines. A similar situation exists in Košice, where the merger of three original courts into one Municipal Court Košice increased the time burden on prosecutors due to the increase in the number of judges in the criminal section from the original 6 to 14. This situation generates unproductive idle time, when prosecutors from different Košice prosecutor's offices are tied to the beginning and end of hearings with one judge, which de facto makes it impossible to rationally plan other official activities.

In the district of the Regional Prosecutor's Office in Trnava, there is a significant physical and psychological burden on prosecutors due to frequent transfers between the districts of Trnava - Piešťany and Senica - Skalica. In addition to the increase in direct financial costs, the main problematic aspect is the loss of time that prosecutors would otherwise have spent exercising their supervisory powers in pre-trial and preliminary proceedings, or managing other agendas. The situation is also complicated by the fact that the court in Trnava refused to introduce a district system at the workplace in Piešťany. A specific problem, which is particularly emphasized by the Regional Prosecutor's Office in Nitra, is the increased costs of overtime work for drivers and prosecutors in cases where the length of the hearing in the regional seat exceeds the normal working hours of the visiting prosecutor from Topoľčany. In the Žilina region, this inefficiency was manifested in the doubling of the needs for the fleet of vehicles and the number of drivers in the territorial districts of selected district prosecutor's offices.

The reform of the court map also had a negative impact on the procedure in the preliminary proceedings, specifically when deciding on prosecutors' motions to take the accused into custody. The Regional Prosecutor's Office Trenčín has identified problems in the availability of judges for preliminary proceedings, when prosecutors from Považská Bystrica and Nové Mesto nad Váhom have to deliver motions to the judge on duty in Trenčín. This causes conflicts in providing transfers and delivering files, which is often resolved only thanks to the informal willingness of members of the Police Force. In Bratislava, the establishment of the new Municipal Court Bratislava I still causes a certain procedural void and stagnation in the hearing of older criminal cases until it is fully stabilized in terms of operations and personnel and the adoption of procedures for managing specific agendas by all criminal judges serving in the Palace of Justice.

In response to these negative aspects, certain specific measures are also being taken in the territorial competence of selected regional prosecutor's offices. The Regional Prosecutor in Trenčín operatively grants exceptions in specific criminal matters for mutual representation of prosecutors (including those on duty) from different districts in one court in order to ensure the economy and efficiency of the proceedings. As a result of the prosecutors of the District Prosecutor's Office Topoľčany having to travel to all stages of criminal proceedings conducted in the District Court Nitra, the District Prosecutor in Topoľčany appointed substitutes on duty who, in the event of the participation of the prosecutor on duty at a hearing before the District Court of Nitra, would handle the cases contested at that time on duty.

In the Prešov region, the activities of prosecutors' offices directly affected by the reorganization of the judicial map were comprehensively regulated in all its aspects by a special instruction of the regional prosecutor in Prešov.

Despite these efforts, the prosecutor's office identifies reduced accessibility of the court for citizens and parties to the proceedings, which in criminal matters leads to a higher rate of non-attendance and the subsequent need for people to be brought before the police.

A unique positive finding is that in the districts of selected district prosecutor's offices (Žilina, Liptovský Mikuláš) a reduction in the length of criminal proceedings is reported, even in the most serious criminal cases. The expansion of the circle of judges to whom criminal cases are randomly assigned has led to their more even workload and faster processing. This experience is a key argument in the ongoing professional discussion on the future form of the prosecutor's office. While one part of the prosecutorial community calls for a return to the original multi-district system of courts, the other is considering whether a solution aimed at making the conduct of criminal proceedings more efficient and at the same time contributing to consolidation could be a consistent "unification of districts" of prosecutorial offices. This is a model that assumes the merger of smaller district prosecutor's offices into larger units that would territorially copy the new district courts. Such a solution would help reduce logistical idle time and increase personnel stability, and last but not least, it would enable the real specialization of prosecutors in more than ten priority areas of criminal activity (from cybercrime to the protection of the financial interests of the European Union).

In conclusion, it can be stated that although the implementation of the court map in the conditions of the prosecutor's office was managed without jeopardizing the legality of the proceedings and the proper and timely fulfilment of its tasks, this came at the cost of an increased burden on personnel and inefficient spending of budgetary funds on transportation. The future stabilization of the sector will require either a systemic correction of the judicial map in terms of strengthening the district system, or a deep reform of the network of prosecutors' offices so that it fully reflects the new judicial reality of the Slovak Republic in terms of organization

C. Efficiency of the justice system

Ministry of Justice: Average lengths of proceedings published for selected case categories (civil, criminal, family and business) are calculated from the length of cases disposed in a particular year - as the time elapsed from the case being lodged with the court until a final court decision in the case (including appeals at all instances)

- **Criminal cases**: the published average lengths of proceedings for criminal cases in 2024 was 7,54 months, disposition time in criminal cases first instance courts was 140,35 days and the clearance rate in criminal cases first instance courts was 99,73 %.

- **Civil cases**: the published average lengths of proceedings for civil cases in 2024 was 16,48 months. Disposition time in civil cases first instance courts was 137,09 days and the clearance rate in civil cases first instance courts 106,76 %.
- **Family cases**: the published average lengths of proceedings for family cases in 2024 was 6,37 months. Disposition time in family cases first instance courts was 110,48 days and the clearance rate in family cases first instance courts 101,08 %.
- **Business cases**: the published average lengths of proceedings for business cases in 2024 was 20,41 months. Disposition time in business cases first instance courts was 332,82 days and the clearance rate in business cases first instance courts 107,59 %.
- **Administrative cases**: the average lengths of proceedings for administrative cases is not being published. Disposition time in administrative cases first instance courts was 860,49 days and the clearance rate in administrative cases first instance courts 93,14 %.

Draft law amending and adding Act No. 757/2004 Coll. on courts and on amendments and supplements to certain laws, as amended, and amending and supplementing certain laws was submitted to the public consultations.

The aim of this proposal is to transfer the powers of the Constitutional Court in the area of deciding on delays in proceedings to general courts and administrative courts and to create comprehensive legal regulations governing proceedings concerning complaints about delays.

The right to have a case heard without undue delay will be protected by a newly introduced institution of complaints against delays, which will be decided by the competent court, and within the framework of these proceedings it will also be possible to award appropriate financial compensation, which until now has only been possible in proceedings before the Constitutional Court. Similarly, a final court decision will subsequently serve as the basis for the possible adoption of measures to remedy the identified shortcomings within the meaning of the applicable legislation, as well as for the enforcement of the right to compensation for damage caused in the exercise of public authority by incorrect official procedures consisting of delays in proceedings.
The proposal is expected to be submitted for the meeting of Government in second quarter 2026.
No. of process LP/2025/370

GPO: **Coordination of LEAs**

In 2025, the prosecutors of the Serious Crime Department ("OZK") did not notice any significant problems in the coordination between prosecutors and investigators of serious corruption cases. Coordination meetings are held regularly on a quarterly basis between the individual Regional Prosecutor's Offices and investigators of the Police Force Presidium and the Regional Directorates of the Police Force, at which specific problems in the investigation of corruption are discussed. In the past, such meetings were organized by the Special Prosecutor's Office ("SPO") at least once a year, while its role has now been taken over by the OZK, which also actively participates in expert meetings in the field of combating corruption.

Corruption Cases vs § 363 of CCP

In corruption criminal matters, a total of 9 motions for action pursuant to Section 363 of the Criminal Code were filed in 2025 (the statistics include the GPO as well as all regional prosecutor's offices), and on their basis, GPO annulled the contested resolution in 2 cases due to unlawfulness and in the remaining cases left the contested resolutions in force. From the above it follows that the institute of extraordinary annulment of final decisions in the preliminary proceedings was used in corruption cases only in 2 cases and exclusively due to an unlawful first-instance decision in order to correct the identified errors. It cannot be said in any case that this institute was misused in any way by the GPO in 2025.

There were also no unlawful interventions by the GPO in major corruption or other cases. On the contrary, public interference in such criminal matters occurred in 2025 by politicians, while in several such cases the Prosecutor General of the Slovak Republic publicly and officially defended the prosecutors concerned and strongly reserved his position against such subjective political interventions in the work of prosecutors.

Ministry of Interior/ Presidium of the Police Force:

The Police Force has no record of any public interference by politicians in specific criminal proceedings in 2025. However, it has recorded a number of public statements by political representatives that were critical of the Police Force and, in some cases, perceived as inappropriate.

In particular, this concerns several statements by politicians from a non-parliamentary party, the content and form of which created increased and inappropriate pressure on civil servants and thus also on law enforcement authorities. Some of these public statements, including repeated statements about so-called "deep ploughing", which had the characteristics of intimidation, fear mongering and undue pressure on law enforcement authorities, were investigated in preliminary criminal proceedings. /see CVS: ORP-534/1-VYS-B1-2025/

The police force perceives political criticism as part of public debate, but at the same time strongly rejects any pressure, intimidation or statements that may go beyond the scope of legitimate political rhetoric and thus constitute an interference with the principles of the rule of law. In cases where public statements may constitute unlawful conduct, the police are obliged to act in accordance with the law.

The police force continues to carry out its activities independently, impartially and professionally, protecting its members and ensuring the unhindered exercise of the powers of law enforcement authorities, regardless of political or media pressure.

Ministry of Justice:

From the perspective of the Ministry of Justice, it is necessary to distinguish between inadmissible interference in the decision-making activities of law enforcement authorities and legitimate public debate on the functioning of criminal justice, which is natural and necessary in a democratic state governed by the rule of law. Public statements by political representatives on ongoing criminal cases cannot automatically be classified as interference with the independence of prosecutors unless they take the form of specific instructions, pressure, or interference in individual procedural decisions.

The Ministry of Justice also points out that its role is to ensure the systemic, legislative, and institutional conditions for the proper functioning of the judiciary, including the prosecution service, and to create space for professional and public scrutiny of its activities to the extent permitted by law. Critical or evaluative statements by political representatives, as long as they concern general systemic issues, transparency, or the accountability of public institutions, cannot be considered an interference with the independence of specific prosecutors.

From this perspective, the Prosecutor General's defense of individual prosecutors is not the only possible or exclusive legitimate framework for responding to public debate. Emphasizing openness, explaining decisions within the limits of the law, and strengthening public confidence in the impartiality of the criminal justice system are just as important for protecting its independence as rejecting actual political interference.

The Ministry of Justice therefore takes the view that the protection of the independence of the prosecution service must be balanced by respect for the principles of democratic accountability and transparency, and that not every public statement by political representatives can be blanketly described as a subjective or unacceptable interference in the activities of prosecutors.

GPO:
2025 – Quality of newly revealed/reported corruption cases
In 2025, no new cases of corruption at the level of constitutional officials, central administration bodies, judges, prosecutors or other comparable cases of corruption in high positions were revealed by the police. However, this fact is related to the significant decrease in the number of all corruption criminal matters, which is described below in the section on statistical indicators, while the primary responsibility for this state of insufficiently revealed corruption cases does not lie with the prosecutor's office, but with the police force, in which significant changes occurred in 2024 compared to the previous state, when investigators of the abolished NAKA had a much higher success rate in revealing all types of corruption.

<u>Ministry of Interior/Presidium of the Police Force:</u>

In 2025, the police uncovered several significant cases of corruption. In the central government sector, charges were brought against a former state secretary for bribery, with the amount of the bribe offered being €740,000. Corruption was uncovered in local government, where two mayors were charged. These cases were concluded in 2025 with a proposal to bring charges. A member of the Slovak Financial Administration was charged with corruption. We would like to highlight a significant case in the investigation of corruption. It involved the dismantling of a criminal group in eastern Slovakia, where not only violent but also corrupt crimes were prosecuted, with charges also being brought against an active police officer in this particular case. In this criminal case involving a criminal group, assets worth approximately €3,300,000 have been seized to date.

The documented amount of bribes requested in 2025 in total was €924,820. Bureau for Combating Organised Crime of the Presidium of the Police Force (hereinafter referred to as the "UBOK") charged 31 individuals and three legal entities with serious corruption offences. Other individuals were charged with less serious corruption offences at individual regional police headquarters.

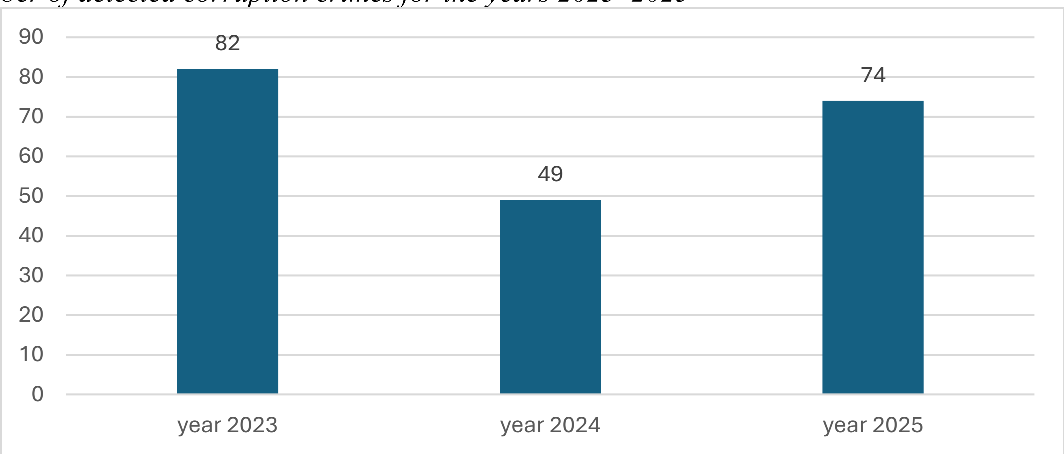
At the beginning of 2026, a large-scale operation targeting perpetrators of corruption offences was carried out. Several individuals were detained during the operation, and charges were subsequently brought against the head physician of a hospital and other individuals. The police are working on several significant cases involving suspected corruption offences. These cases are currently under investigation and it is not possible to comment on them at this stage, as this would jeopardize the investigation.

The UBOK is investigating several significant criminal cases supervised by the European Public Prosecutor's Office. At the same time, it is assisting the EPPO in investigating crimes committed across several EU countries. In 2025, several significant cases were investigated under the supervision of the EPPO. In one specific case, several people were charged with causing damage amounting to EUR 7 million to the EU budget.

The GP SR attributes the decline in the number of solved corruption cases to a general decrease in the number of cases, without taking into account the seriousness of individual corruption cases. Numerous corruption cases in the past, which the GP SR uses to support its argument, **did not have any impact on EU funds or the state budget.** Specialised units focus primarily on investigating serious corruption. Statistics indicators of the GPO does not take into account the seriousness of individual cases.

<u>Ministry of Justice:</u>

Number of detected corruption crimes for the years 2023–2025



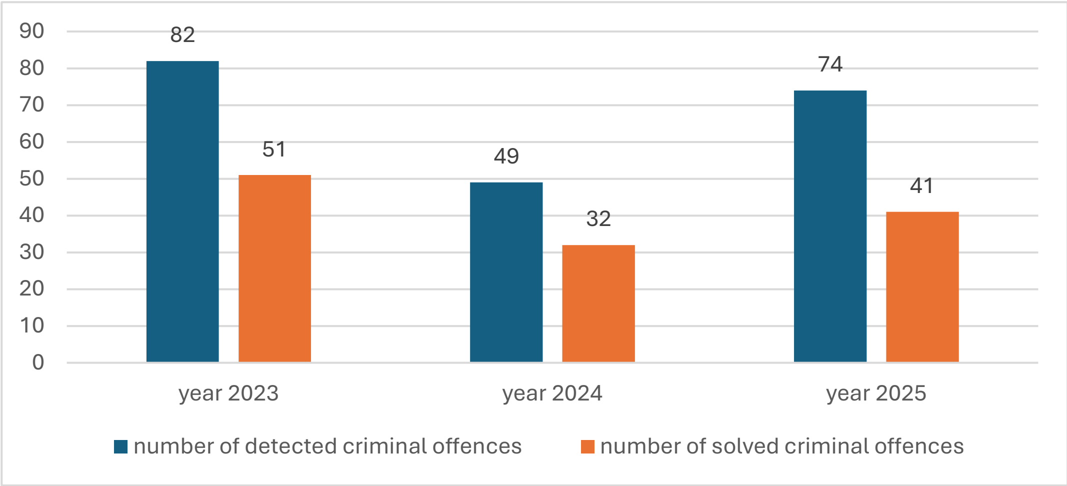
Source: Statistical data P PF

Statistical data on the development of the number of detected corruption crimes in the period from 2023 to 2025 show that this development can be characterized as relatively stable. Despite a slight decline in 2024, this is not a systematic or long-term decline that would justify the conclusion that there has been a significant reduction in the incidence of corruption-related crime.

The fluctuation appears to be more of a short-term deviation within the natural variability of statistical data than a sign of a fundamental change in the trend. In a broader time context, therefore, it is not possible to speak of a significant decline in the number of detected corruption crimes, but rather of a maintenance of a comparable level of their occurrence.

When evaluating these data, it is also necessary to take into account that statistical indicators in the area of corruption are significantly influenced by the intensity of detection activities by law enforcement authorities, as well as by changes in the methodology of recording and classifying offences. The number of detected crimes cannot therefore be automatically equated with the actual level of corruption in society, but must be assessed in the broader context of the state's repressive and preventive instruments.

Number of detected/solved corruption crimes for the years 2023–2025



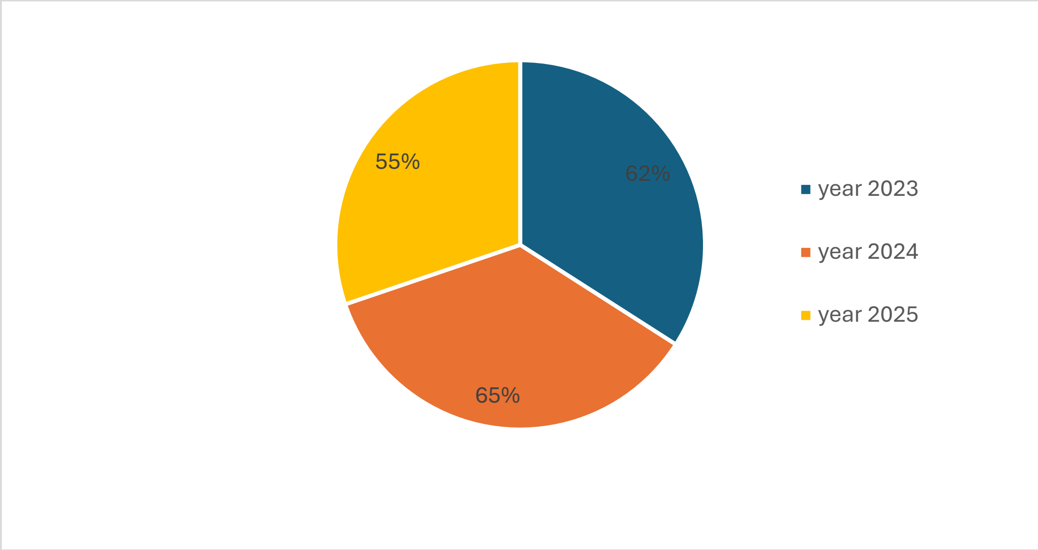
Source: Statistical data P PF

A similar trend can be identified in the development of the number of solved crimes, which in the monitored period does not show any significant fluctuations or long-term trends leading to a substantial increase or decrease. The available statistical data show that the clearance rate has remained relatively stable, which indicates continuity in the detection and investigation activities of law enforcement authorities.

This stable development can be interpreted as a manifestation of consistent application practice and the functionality of existing procedural and institutional mechanisms of criminal proceedings. At the same time, it indicates that there have been no legislative or systemic changes that would have an immediate and significant negative impact on the ability of law enforcement authorities to solve criminal offenses.

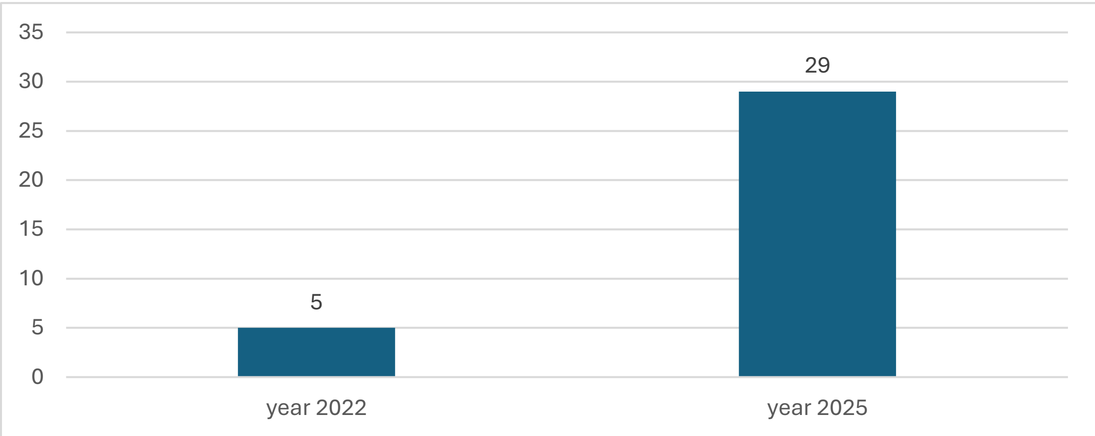
When evaluating these data, however, it is necessary to take into account that the clearance rate is determined by several factors, including the complexity of the facts, the difficulty of proving individual cases, and the manner in which criminal proceedings are conducted. Stability in this indicator therefore does not in itself allow for clear conclusions to be drawn about the actual development of crime, but rather indicates that the effectiveness of law enforcement agencies remained at a comparable level during the period in question.

Clarity of corruption crimes for the years 2023–2025

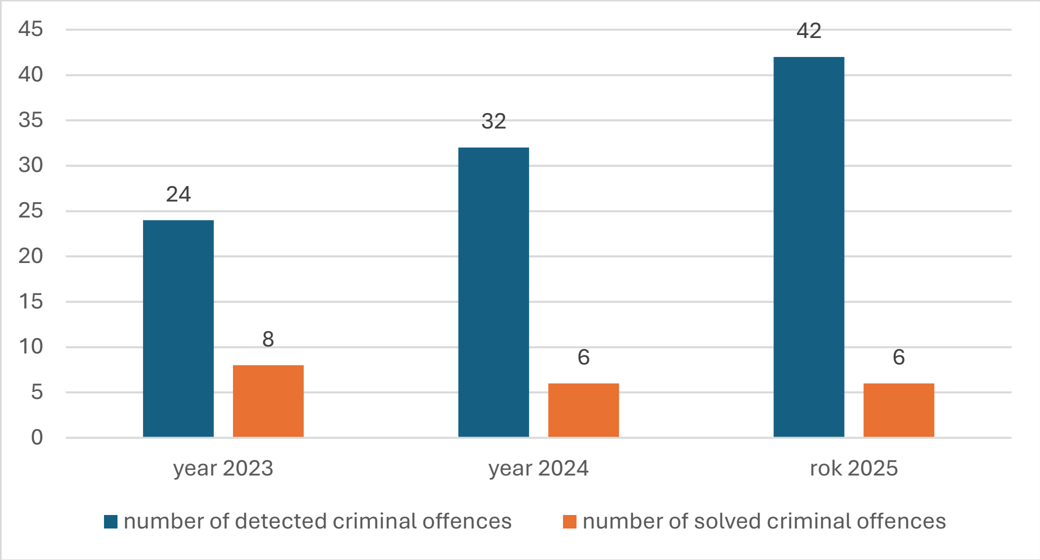


Source: Statistical data P PF

Number of assistance provided to EPPO



Number of criminal offenses affecting the EU's financial interests solved



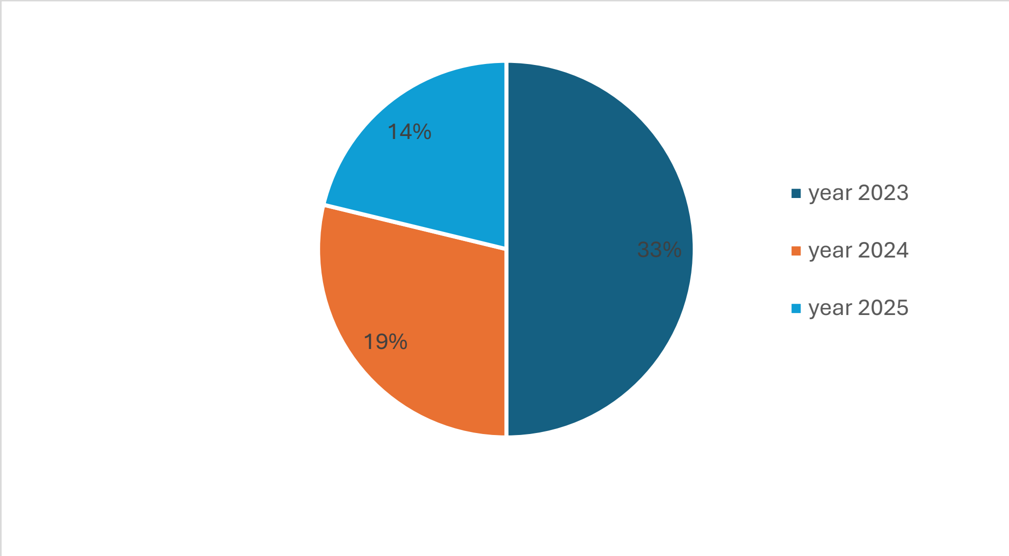
Source: Statistical data P PF

However, compared to previous periods, a growing trend can be identified in the number of solved crimes affecting the financial interests of the European Union. This development can be considered significant, as it reflects the increased effectiveness of law enforcement authorities, as well as the deepening and improvement of cooperation with the European Public Prosecutor's Office.

This positive trend is also the result of the gradual harmonization of national procedures with European standards for the protection of the financial interests of the European Union, as well as an increased emphasis on professional specialization and methodological guidance in this area. Improvements in the investigation of these crimes contribute to strengthening confidence in the state's ability to effectively protect public funds and also have a preventive effect on potential perpetrators.

This development can also be seen as an indicator of the stabilisation of cooperation between national authorities and the European Public Prosecutor's Office, which is gradually translating into higher quality procedural practices, better identification of criminal proceedings and more effective use of available investigative tools. In the longer term, this is a factor that has a significant impact on the overall level of protection of the European Union's financial interests at national level.

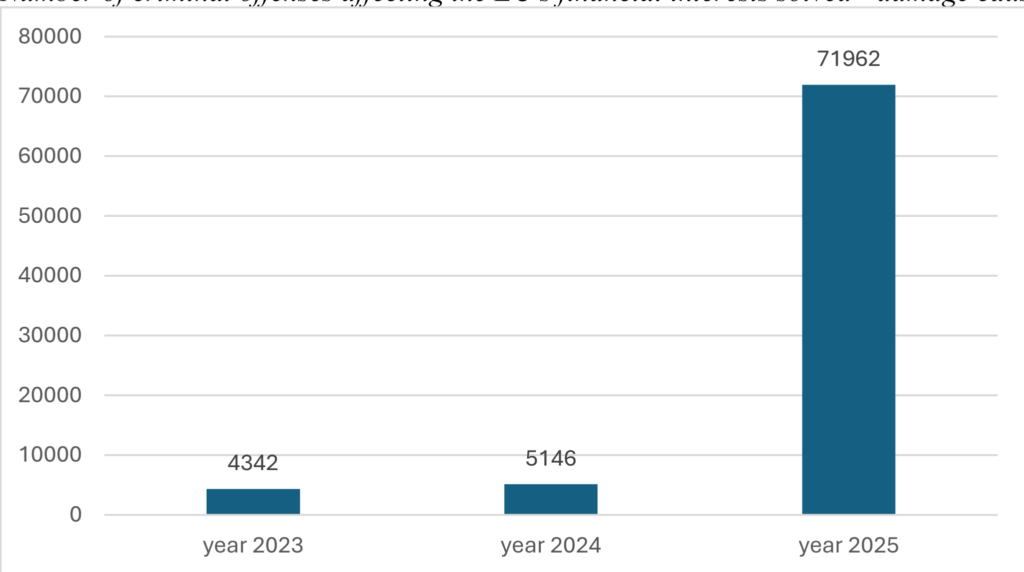
Number of criminal offenses affecting the EU's financial interests solved



Source: Statistical data P PF

Improved results in solving these crimes point to a higher level of cooperation, information exchange, and coordination of procedures compared to previous years. At the same time, they document the strengthening of institutional mechanisms aimed at protecting the financial interests of the European Union, which is of fundamental importance not only in terms of compliance with the international obligations of the Slovak Republic, but also from the perspective of preventing and suppressing sophisticated economic crime.

Number of criminal offenses affecting the EU's financial interests solved - damage caused (in euro)



Source: Statistical data P PF

The General Prosecutor's Office of the Slovak Republic stated that in 2025, the Slovak police did not uncover any new cases of corruption at the level of constitutional officials, central government bodies, judges, prosecutors, or other comparable cases of corruption in high positions. However, this statement may give the misleading impression that the absence of "new cases" of corruption among constitutional officials, central government bodies, or judicial representatives is a negative phenomenon or a failure on the part of law enforcement agencies. In reality, however, such a conclusion implicitly prejudges the assumption that persons holding the aforementioned positions are necessarily committing criminal offenses, which cannot be objectively assumed without specific findings and evidence.

The absence of detected cases may also reflect a situation in which such criminal activity does not occur, or does not occur to an extent that would give rise to reasonable suspicion for criminal prosecution.

From the perspective of the rule of law, therefore, the absence of detected cases cannot be automatically interpreted as a deficit in the activities of the police (or even the prosecutor's office itself), but rather as a neutral statement of the factual situation, which in itself does not allow for evaluative conclusions to be drawn about the extent of corruption at high levels of public authority. The assessment of the effectiveness of law enforcement agencies should not be based solely on a formalistic evaluation of quantitative indicators.

GPO: Measures related to the length of proceedings for resolving pending cases
a) In General
- Special attention/focus – preliminary proceedings in cases of the former Special Prosecutor’s Office of the General Prosecutor’s Office of the Slovak Republic, transferred to the materially relevant and locally competent prosecutor's offices.

In the calendar year 2025, the performance of the prosecutor's office's competence focused on the efficiency of the justice system as one of its priority areas. Its qualitative level in the evaluated period of the calendar year 2025 is determined primarily by the ability to proactively eliminate the unreasonable length of criminal proceedings. The societal and institutional status of the prosecutor's office as a guarantor of legality in pre-trial criminal proceedings requires the implementation of a comprehensive set of measures that are not only a reactive tool for detected inaction, but also form a comprehensive system of preventive and management mechanisms.

The general state of efficiency of the justice system is currently influenced mainly by procedural fluidity in the so-called **outstanding criminal matters** in which the investigation exceeds the time horizon of one, two or three years. In relation to criminal matters meeting the above parameters, a **special measure of the Prosecutor General** was adopted in the past (and was continuously fulfilled at that time), which also applies to motions of police officers for a final measure that have been pending for more than 3 months. However, the Prosecutor's Office throughout the Slovak Republic consistently approaches this issue through other hierarchically arranged tools at the regional and district levels, which can be categorized as methodological-control, organizational-management and procedural-sanction. Their common denominator is the effort to achieve the appropriateness of the length of criminal prosecution in strict accordance with the principles of the rule of law.

Within the methodological-control activities, the institutionalized review activity of supervisory prosecutors dominates, which represents a key analytical tool for identifying the causes of stagnation of particular criminal proceedings. The content of these measures is regular monthly (in custodial criminal matters) or quarterly (in non-custodial criminal matters) reviews of investigation files with subsequent preparation of records, and each time after reaching a significant procedural milestone in the form of initiating criminal prosecution and filing charges, the reviews are submitted to the chief prosecutors, as well as to superior prosecutorial units as part of the periodic fulfilment of the so-called administrative duty. This process is not limited to passive monitoring of the status, but includes a detailed substantive analysis of old cases with the aim of defining specific solutions for their effective legal termination. In this sense, supervisory prosecutors are obliged to report at regular working meetings on objective and subjective reasons preventing the termination of the relevant criminal case, including measures they intend to take towards their elimination. The taxonomy of these control mechanisms is further internally differentiated into regular checks and extraordinary checks focused on specialized registers, thus ensuring continuous pressure on the smooth conduct of pre-trial criminal proceedings by members of the Police Force.

The organizational and management level of measures focuses on interdepartmental coordination and internal rulemaking, which defines strict deadlines for the prosecutors' actions. An important element is the implementation of regular coordination and working meetings with the management of the relevant departments of the Police Force, at which the prosecutor's office constantly appeals for the priority processing of older cases and requires the adoption of personnel measures by the investigative units. Part of this effort is also the introduction of internal deadlines for deciding on complaints, processing proposals for final measures or deciding on detention requests, which in an optimal state do not exceed the limit of several working days. This approach minimizes subjective delays on the part of the prosecution and transfers the focus of responsibility for the speed of proceedings to the evidence-gathering phase on the part of the police, where, in the event of deficiencies, signalling is applied to superior police officials or, in justified cases, the institute of unassigning the case from a police officer acting with insufficient effectiveness.

Despite the systematic efforts of the prosecution, several objective barriers have been identified that disproportionately extend the length of criminal proceedings and are not directly influenced by prosecutorial measures. The most striking reason for the unreasonable length of proceedings, especially in cases exceeding three years, remains the execution of legal assistance abroad, especially in relations with jurisdictions overseas, where communication takes place exclusively at the level of central authorities and is associated with time-consuming administrative processes. Other relevant factors are the factual and legal complexity of the incoming cases, the extensiveness of the evidence in economic matters, the need to carry out expert examinations and financial analyses, as well as the procedural complications related to determining the residence of persons or appointing guardians for legal persons. The critical point remains the personnel situation within the Police Force, where the **insufficient number of investigators and the staff turnover caused by the reorganization directly weaken the effectiveness of prosecutorial supervision.**

At the stage of judicial proceedings, the effectiveness of the prosecutor's office is manifested in the **active monitoring of the inaction of the courts and the application of legal tools for legal remedy.** These tools include procedures where prosecutors, if the legal conditions are met, in accordance with a special measure of the Prosecutor General, file complaints about delays in proceedings with the presidents of the relevant courts. These complaints are usually preceded by informal requests addressed to the management of the court concerned. The aforementioned model of operational communication allows the presidents of courts to supervise the setting of hearing dates, while the courts usually respond to these notifications by issuing a criminal order or by justifying objective obstacles preventing the further course of legal proceedings in a particular criminal case.

In criminal matters within the competence of the former Special Prosecutor's Office of the General Prosecutor's Office, maximum emphasis was placed in 2025 on maintaining the continuity and smoothness of supervision over compliance with the law before the initiation of criminal prosecution and in the preliminary proceedings, as well as on the qualitative aspect of the exercise of prosecutors' powers in court proceedings, for which a series of special measures were adopted by the Prosecutor General. **The Prosecutor's Office applies an increased supervision regime to these matters, which includes a monthly evaluation of the incoming cases, the charges brought and the overall execution, with special attention being paid to the criminal offences of corruption and damage to the financial interests of the European Union.**

The content of supervision in these cases focuses on **eliminating the negative impacts of the reorganization of the Police Force, which in 2024 and 2025 manifested itself in the form of personnel instability and a temporary paralyzing effect.** In these cases, prosecutors actively use supervisory powers to stabilize the proceedings, continuously request reports on procedural progress and set deadlines for the execution of specific acts of criminal proceedings.

Despite the positive results achieved, the length of the preliminary proceedings in this agenda remains negatively affected by the need to review extensive case materials by new investigators after the abolition of the original specialized units. Disorganization associated with the transfer of files and a chain of changes in the personnel of investigators led to a temporary stagnation of proceedings, which prosecutors corrected by imposing binding instructions and signalling to senior police officers.

From an institutional point of view, the procedures in the corruption agenda are also being evaluated on the platform of interdepartmental working meetings with the relevant components of the Police Force, which results not only in the intensification of collaborative activities with investigators of specialized units of the Police Force, but also in the adoption of measures for the further specialization of prosecutors.

An important milestone in the professionalization of managing the agenda of criminal offences of corruption can undoubtedly be marked by the instruction of the Prosecutor General, No. 17/2025 of 30 December 2025 on the establishment of specialization of prosecutors for criminal offences corruption, not only in the department of serious crime of the General Prosecutor's Office, but also in each of the regional prosecutor's offices. In this sense, corruption criminal proceedings officially become the main focus of activity of **at least three prosecutors - specialists in each of the affected components of the prosecutor's office.**

A comprehensive set of benefits can be expected from the concentration of incoming criminal matters of the above-mentioned special nature, consisting primarily in increasing the expertise and quality of decision-making thanks to the systematization of the training of prosecutors - specialists, as well as in accelerating the speed of proceedings due to the streamlining of the coordination of investigations with special parts of the Police Force as the basic procedural partner.

The overall assessment shows that although the Prosecutor's Office of the Slovak Republic in 2025 successfully implemented a wide range of measures to accelerate proceedings and stabilize the management of the agenda of the abolished Special Prosecutor's Office of the

General Prosecutor's Office, **the overall effectiveness of the system remains conditioned by the personnel situation in the Police Force.** Continuous monitoring of quantitative and qualitative indicators, consistent reviewing activities and interdepartmental communication remain a permanent guarantee of the functionality of the criminal justice system of the Slovak Republic.

Ministry of Interior/Presidium of the Police Force:

Regarding the prosecutor's office's statement *that* "*the use of signals from superiors or the institution of removing a case from a police officer are tools available to the prosecutor precisely so that he can guarantee the legality of the preliminary proceedings*". **The prosecutor's office has been using these tools for a long time, not just in 2025**. Given that these are legal tools, we believe that the prosecutor's office is obliged to apply them. We are stating this in particular to objectify the prosecutor's office's statement so that its opinion is not **perceived selectively, only for the period in which the rule of law is currently being assessed.**

While it is true that the Police Force has an insufficient number of police officers, but this fact concerns police officers in basic units who **do not** investigate or detect corruption offences. There are an adequate number of police officers who specialise in detecting and investigating corruption. Staff turnover during the organisational change primarily affected police officers who did not specialise in detecting and investigating corruption offences. In this context, we consider it very necessary to add that in 2023 and 2024, there was a relatively significant departure of police officers *(in general, not only those who worked in specialised units)* to civilian life, which, **however, was not caused by decisions of the Ministry of the Interior of the Slovak Republic or the Police Force, but because of a 14% increase in retirement pensions**. This was the highest number of police officers ever, and the Police Force had to deal with it. Nevertheless, as part of the fight against corruption, investigators with **an average of 15 years** of investigative experience**, i.e. experienced investigators,** are assigned to specialised units and regional police headquarters.

The Public Prosecutor's Office further states that "*in order to eliminate the negative effects of the reorganisation of the police force, which manifested themselves in 2024 and 2025, it actively uses its supervisory powers to stabilise proceedings by continuously requesting reports on the progress of proceedings and setting deadlines for the performance of specific criminal proceedings*." In this context, we consider it necessary to reiterate the conclusion that the prosecutor's office has been exercising these powers for a long time, not only during the period under review. Investigators have a legal obligation to report to the supervising prosecutor on the status of proceedings. Setting specific deadlines for procedural actions is a power that the prosecutor exercises not only occasionally, but frequently in numerous cases. We would like to point out again that these legal powers available to the prosecutor's office are **exercised by it on a long-term basis and not only during the period under review.**

Similarly, the statement that, in the sense of the phrase used by the prosecutor's office, "disorganisation" associated with the transfer of files and a series of changes in the staffing of investigators led to a temporary stagnation of proceedings, which prosecutors remedied by issuing binding instructions and notifying senior police officers, **does not appear to us to be correct information or a correct statement**. The organisational change, which resulted, among other things, in the transfer of some of the investigation files, caused short-term delays in these proceedings. However, these short-term delays did not result in the expiry of the limitation period. Similarly, the organisational change did not have any impact on criminal cases requiring priority treatment *(custodial cases),* which would have resulted, for example, in the release from custody due to delays in the investigation and the like.

The police force has no record of any criminal case in which the public prosecutor's office has initiated an investigation due to delays in the investigation. According to the Criminal Procedure Code, the prosecutor may conduct the entire investigation. There were no such steps taken by the prosecutors.

It is a fact that the organisational change caused minor complications in the smooth running of the investigation, which led to delays in the investigation of some criminal cases. The reasons for the slowdown were mainly that, before and immediately after the organisational change, it was necessary to carry out various administrative tasks related to the re-registration of criminal cases. In this regard, however, it is important to note that the delays in the investigation were not caused solely by the organisational change, but that in some criminal cases the delays in the investigation were long-term even under the former National Criminal Agency. UBOK investigators had to focus on those files where the former NAKO had caused delays through inaction. Nevertheless, the operational units continued to detect crimes of corruption and the investigators continued to gather evidence.

Since January 2025, the situation at UBOK has stabilised and investigators conducting criminal investigations, including those within the jurisdiction of the EPPO, are now working smoothly and without delays.

The GP SR criticises the fact that the organisational change led to staff turnover among police officers and the redistribution of investigation files. The same thing happened at the prosecutor's office. Following the organisational change, which resulted in the abolition of the former Special Prosecutor's Office, all criminal cases in which no indictment had been filed were delegated to regional prosecutor's offices. All former prosecutors of the abolished Special Prosecutor's Office were assigned to individual departments of the GP SR. It follows from the above that all criminal cases in which no indictment had been filed were redistributed among prosecutors of the GP SR and regional prosecutor's offices, who, just as in the case of redistributed criminal cases involving police officers, had to study the cases and familiarise themselves with them. **The GP SR therefore criticises the PZ for precisely the same internal personnel and administrative processes that it had to apply in an identical manner itself.**

With regard to the organisational change, we consider it necessary to draw attention to its fundamental objective, which is to streamline the activities of the specialised unit so that members of the Police Force assigned to such a unit are not used to investigate and detect less complex and simple cases, but to carry out the detection and investigation of only the most serious criminal offences, in particular the detection and investigation of criminal offences committed by dangerous groups under Section 141 of the Criminal Code, particularly serious and organised crimes, especially in the area of violent crimes, extortion, using booby-trapped explosive devices and terrorism, detecting crimes within the jurisdiction of the European Public Prosecutor's Office, detecting and investigating crimes of corruption on the basis of selective jurisdiction, detecting and investigating crimes committed by dangerous groups under Section 141 of the Criminal Code, or particularly serious organised crimes, especially in the area of property crimes and economic crimes,

with an emphasis on tax crimes and related activities, as well as financial investigations and activities related to the siphoning off of assets under a special regulation.
In connection with the above, it is also **worth noting that the jurisdiction of NAKA P PZ also covered simple criminal offences, which are investigated abroad by general units** ***(e.g. petty corruption that had no impact on the misuse of EU funds and no impact on the public finances of the Slovak Republic, as well as crimes of extremism) In no EU country are such "minor" crimes investigated by units with nationwide jurisdiction,*** **but *by* units that correspond to the level of regional police headquarters and district police headquarters within the Slovak Republic.** The organisational change, including the change in jurisdiction, was aimed primarily at ensuring that investigators from the specialised police unit focus on investigating serious corruption and do not have to deal with crimes that are investigated by local police units abroad

Ministry of Justice:

None of the key procedural tools used to detect and prove corruption offences have been removed from the Criminal Procedure Code, including special investigative measures such as the use of agents, surveillance of persons and property, and the use of information technology. The legal framework thus continues to provide law enforcement authorities with sufficient powers to effectively investigate and document corruption offences, even in cases where they are particularly difficult to prosecute and prove. The absence of legislative restrictions on these tools calls into question the conclusion that the prolongation of criminal proceedings is primarily the result of systemic or normative obstacles.

The length of criminal proceedings is largely determined by the manner and intensity of the use of available procedural means, as well as the effectiveness of coordination between the prosecutor's office and investigators. In these circumstances, delays cannot be automatically attributed solely to objective factors, but it is also necessary to take into account the issue of procedural management of cases, the timeliness of decisions taken, and the strategic management of evidence in individual cases.

It follows from the above that, although there may be circumstances of an objective nature in specific cases, the mere existence of such obstacles cannot be declared across the board as the main cause of the prolongation of criminal proceedings, as long as the law continues to allow the use of effective tools for detecting and proving corrupt criminal activity.

Corruption cases

The General Prosecutor's Office of the Slovak Republic (OZK) did not record any cases of significant delays in proceedings by investigators or supervisory prosecutors in the performance of supervisory activities over corruption cases that were transferred from the SPO to individual regional prosecutor's offices. The plan of the main tasks of the GPO for 2026 included, among other things, a comprehensive and systematic review and assessment of the legality of the procedure of criminal prosecution authorities in all criminal corruption cases that, as of 20.3.2024, after the abolition of the Special Prosecutor's Office, were transferred to the competence of regional prosecutor's offices. According to the aforementioned plan, the review will be carried out during the first half of 2026 and an assessment of the facts found will be submitted to the Prosecutor General of the Slovak Republic by 30.6.2026. The above-mentioned comprehensive review will focus, among other things, on the issue of the length of the preliminary proceedings in cases transferred from the SPO to the regional prosecutors' offices.

Other – please specify
Required supplemental issues
GPO: **Current state of general cooperation with European Public Prosecutor's Office**

Current state of cooperation between European Union and Prosecutor's Office of Slovak Republic is characterized with high effectiveness, which can be attributed to proactive internal rulemaking of General Prosecutor, represented by General Prosecutor's Directive no. 37/2024 of 28 August 2024 about procedure of prosecutors in cases, which belongs to the competence of European Public Prosecutor's Office and about a cooperation with European Public Prosecutor's Office.

The specified service regulation represents the key institutional platform regulating the procedures of national prosecutors in relation to European Public Prosecutor's Office, specifying not only the communication methods, but particularly division of powers and forms of cooperation, by which it guarantees the effective implementation of European law in the setting of Slovak Prosecutor's Office. From the perspective of specific methods and forms of cooperation at multiple functional levels, it sets differentiated rules for fulfilment of the information and reporting obligation, implementation of the mechanism and effects of so-called evocation of a criminal case, fulfilment of the principle of loyal cooperation and active support, referral back to national authorities, but also judicial cooperation with third countries.
The primary benefit of the General Prosecutor's directive can thus be identified as ensuring a high level of legal certainty and procedural integrity in criminal proceedings, thanks to a clear definition of jurisdictional boundaries with significant potential to prevent jurisdictional disputes or duplicate investigations.
Overall, it creates a robust system, which not only fulfils the obligations of the Slovak Republic towards the European Union, but also streamlines the fight against crimes affecting the financial interests of the European Union through close cooperation at all levels of the prosecution service.

II. Anti-Corruption Framework

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

Office of the Government of the Slovak Republic:
The Anti-Corruption landscape in Slovakia shifted significantly from 2024 (a year of structural reorganizations and legal reforms) to 2025 (a year of institutional consolidation and preventative planning).
The Slovak Government Office has focused heavily on **systemic prevention** and administrative oversight and its **State Security and Corruption Prevention Section (SBŠPK)**, has taken a more "holistic" approach by **linking corruption prevention with corruption risk management through the international standards (ISO 37001 Anti-bribery Management Systems)**
The most significant milestone is the adoption of the National Anti-Corruption Strategy for 2026–2029 (the "Strategy") at a meeting of the Government of the Slovak Republic on

January 21, 2026. The Strategy was subject to the standard and inclusive legislative process governed by the **Legislative Rules of the Government of the Slovak Republic**.

- **Public Consultation (MPK):** The draft was published on the official state website for an inter-departmental consultation procedure (**Slov-Lex)**. This allows not only state institutions but also NGOs and the general public to submit "mass comments" (*hromadná pripomienka*).

Unlike the previous document, this one is assessing the progress with an Action Plan across all 15 ministries and encourages implementation of Anti-Bribery Standards (ISO 37001 **Anti-bribery management systems**).

On August 20, 2025, the Slovak Government officially adopted the **Government Resolution No. 415/2025** the **Code of Conduct for Persons with Top Executive Functions** (PTEFs) (“**Code**”).

The foundation for the Code was the **OECD Integrity Review of the Slovak Republic**, published in early 2022. In this review, the OECD analyzed the gaps in Slovakia's anti-corruption framework and explicitly recommended the creation of a dedicated Code of Ethics/Conduct for "Persons with Top Executive Functions" (PTEFs), including ministers and state secretaries.

The adoption of this Code was also a direct response to the **GRECO** (Group of States against Corruption) **Slovakia's 5th Evaluation Round**, which focuses specifically on preventing corruption and promoting integrity among **Persons with Top Executive Functions (PTEFs)** and was a key step for the Slovak Republic in 2025 to improve its standing within the Council of Europe's monitoring cycles and move toward full compliance with international anti-corruption standards.

Main Points of Alignment with GRECO:

- **Closing the Legislative Gap:** In its evaluation reports, GRECO repeatedly criticized Slovakia because while regular civil servants had a Code of Ethics, a comprehensive document for top political representatives (ministers, state secretaries) had long been missing.
- **Defining Standards of Conduct:** Resolution No. 415/2025 introduces specific ethical standards regarding conflicts of interest, gifts, lobbying, and outside activities—key GRECO requirements for strengthening the integrity of the executive branch.
- **Monitoring and Compliance:** Its adoption in 2025 allowed Slovakia to demonstrate progress in fulfilling recommendations that were previously labeled as "not implemented" or "partially implemented" in prior Compliance Reports.
- **Cooperation with OECD:** The fact that the material was developed in coordination with OECD ensures that the Slovak solution respects international standards, which GRECO takes into account during its reviews.

The Code was developed by the Government Office of the Slovak Republic and was a key step in fulfilling Slovakia's Government's policy statement for 2023–2027.

Timeline of Adoption

- **Draft Submission (Early 2025):** The draft was submitted into the inter-departmental consultation procedure under the identifier LP/2025/69.
- **Public Consultation:** The inter-departmental comment period ended on **March 10, 2025**.
- **Official Approval:** Approved by the Government during its 98. session on **August 20, 2025**.

Publication: The Code was required to be published on the official website of the Government Office of the Slovak Republic by **September 24, 2025**

https://www.bojprotikorupcii.gov.sk/o-nas/ and it is published on the official website of the session of the Government.

SBŠPK within the scope of systematic prevention has created the **Methodological Recommendation for Corruption Risk Management**, as referenced in Government Resolution No. 256 of May 15, 2025. The material is corresponding with the request by **NIKA** (National Implementation Authority), which serves as the "single point of contact" for the European Commission. It is legally required to implement **Arachne** (the EU's risk-scoring tool) or equivalent national systems (like the ISPO Red Flags) to ensure EU funds are not misused.

Strengths of the Methodological Recommendation for Corruption Risk Management

The document serves as a **strategic pillar for anti-corruption efforts** in Slovakia. Its primary strengths in the area of prevention include:

• Proactive and Systematic Approach:

Instead of merely reacting to corruption scandals after they occur, the methodology shifts the focus toward prevention. It requires institutions to identify "weak spots" in their internal processes and create a comprehensive Corruption Risk Map, effectively neutralizing threats before they are exploited.

• Alignment with International Standards (ISO & OECD):

The methodology is built on the ISO 31000 (Risk Management) standard and the OECD Public Integrity Handbook. This ensures that Slovak state bodies use internationally recognized terminology and proven procedures, facilitating better evaluation by international monitors like GRECO.

• Objective Assessment and Scoring (Heat Mapping):

The recommendation provides a structured framework for evaluating risks based on two variables: probability of occurrence and potential impact. This quantitative approach removes subjective bias and allows organizations to prioritize high-risk areas such as public procurement and subsidy management.

• Clear Accountability (Defining "Risk Owners"):

One of the strongest features is the requirement to designate specific individuals as Risk Owners. These persons are directly responsible for monitoring identified risks and implementing mitigation measures, which prevents the "dilution of responsibility" often found in public administration.

• Integration of Practical Control Mechanisms:

The methodology goes beyond theory by suggesting concrete "mitigation tools." These include the "four-eyes principle," mandatory staff rotation in sensitive positions, and the digitalization of decision-making processes to reduce human discretion.

• Enhanced Transparency and Public Oversight:

By being published on the Government Office website Metodické odporúčanie k riadeniu korupčných rizík | Boj proti korupcii , the methodology acts as a tool for public accountability. It allows NGOs and the general public to monitor whether state institutions are actually implementing the safeguards they committed to in their risk assessment plans.

This methodology, alongside the **Code of Conduct of the PTEFs** (Resolution No. 415/2025), forms a comprehensive **"Integrity Package"** designed to modernize the Slovak public sector.

To update as regards all relevant changes to the institutional framework on whistleblower protection, including their impact in practice

The government's draft bill on the Office for the Protection of Victims and Whistleblowers responded to problems with the application of the Whistleblower Protection Act, particularly in the context of insufficient rights of employers of protected whistleblowers and bad practices by the Whistleblower Protection Office.

Firstly, it is necessary to point out the bad practice of the Whistleblower Protection Office, which created an illegal situation where the Office provided protection to criminally prosecuted persons who were in the service of members of the Police Force – this undesirable situation was also pointed out by the Constitutional Court of the Slovak Republic in its decision I. ÚS 220/2025, point 28. "No provision of the Whistleblower Protection Act can be interpreted as having been adopted with the aim of providing protection to persons under criminal prosecution." and in points 19, 20, and 23 of the decision, the Constitutional Court cites the decisions of the Supreme Court that the service relationship of a member of the Police Force does not have the characteristics of a private-law relationship and that a superior's service order (such as temporary suspension from public service pursuant to Section 46 of the Act on Public Service of Members of the Police Force) is an individual administrative act which is a decision on public subjective law and is not definitive in nature, and that such action by a superior (minister) cannot in itself be stigmatized as unlawful.

We note that the European Court of Human Rights judgment in Halet v. Luxembourg (21884/18) confirmed the principles for the protection of whistleblowers and specified six criteria:

1. Preferential use of internal reporting channels
2. Authenticity of reported information
3. Good faith – it is necessary to verify that the whistleblower is not motivated by personal gain; assess the relationship with the superior or whether the whistleblower's actions had other ulterior motives and determine whether there was an unjustified personal attack. When assessing good faith, it is important to consider whether the whistleblower resorted to the media or distributed leaflets in order to attract maximum public attention (Heinisch v. Germany) or if the whistleblower first attempted to remedy the situation he was complaining about through internal company procedures—we note that members of the police force were granted protected witness status a week before the elections (when, according to polls, it was clear that the political leadership of the state would change and their illegal actions would be subject to a proper audit) and subsequently became media personalities with the help of some media and NGOs, using their position for commercial or monetization purposes (public collections, where more than €400,000 was collected for the salaries of criminally prosecuted persons[7],[8] or publication of a book[9])
4. Public interest in published information
5. Damage caused to the employer
6. Severity of the sanction – the Constitutional Court ruled that the service relationship of a member of the Police Force does not have the characteristics of a private law relationship, an order issued by a superior (such as temporary suspension from public service pursuant to Section 46 of the Act on Public Service of Members of the Police Force) is an individual administrative act, which is a decision on public subjective law and is not definitive in nature, and such an action by a superior (minister) cannot in itself be stigmatized as unlawful.

[7] https://donio.sk/curillovci
[8] https://donio.sk/vysetrovatelia
[9] https://www.martinus.sk/3015809-curillovci/kniha

According to the case law of the European Court of Human Rights, it is clear that members of the police force abused their whistleblower status.

Secondly, systemic change at the Office for the Protection of Victims and Whistleblowers was also necessary because the functioning of the office did not meet the necessary standards of objectivity and impartiality. According to the whistleblowing directive (2019/1937/EU), member states are required to "establish independent and autonomous external reporting channels, for receiving and handling information on breaches".

However, through its activities, personnel structure, and the way its processes were implemented, the Office did not meet these criteria. The activities and decisions of the Office created an anti-systemic element, whereby the Office did not act independently and impartially, but, among other things, promoted the interests of whistleblowers only selectively, thereby failing to fulfill its statutory mission. .

The Office's practice was to give protection to specific politically active persons who are publicly known critics of the current governing coalition (mentioned above), where we repeat that the Constitutional Court ruled that the legislator did not anticipate that whistleblower protection would be granted to persons under criminal prosecution.

The Office’s Chair is in a conflict of interest, as her husband is a founding member of an opposition party, a long-standing active politician (having repeatedly run for election to the National Council of the Slovak Republic as well as the European Parliament), who continues to publish strongly politicized criticism of the Government of the Slovak Republic.[10] The Office’s Chair worked at the organization VIA IURIS,[11] which was funded by organizations that sponsor political activities, for example the Open Society Foundation, whose founder is one of the largest sponsors of liberal policies as well as of the largest liberal political party in the United States.[12] She also cooperated directly with the Open Society Foundation.[13] At the time when she worked at VIA IURIS (and in subsequent years), this organization was funded by the ESET Foundation, while the owners of the company ESET are sponsors of an opposition political party[14] (as well as of its candidates at both municipal[15] and national[16] levels), of which her husband is a founding member. [17]

[10] See personal blog of husband of the president of the office: https://mirokocur.sk/. In 2025 alone, the name of the prime minister appears more than 20 times in his public statements, almost always in a negative context. A selection of his statements: "However, I am very disturbed by the spread of lies, prejudice, and hatred managed by Robert Fico with his comrades and young followers. Similarly, anyone who does not consider lies and the spreading of hatred based on prejudice to be perverse, but is offended by the fabrications and nonsense of malicious people, is also dangerous." Berme Fica vážne a zastavme ho - mirokocur.sk - “ Do we need even more proof that Fico's false game must be stopped?“

[11] https://viaiuris.sk/wp-content/uploads/2017/09/vyrocna-sprava-2013.pdf

[12] https://www.congress.gov/118/meeting/house/117680/documents/HMKP-118-JU00-20240919-SD006.pdf https://www.theguardian.com/business/2018/may/29/enemy-of-nationalists-george-soros-and-his-liberal-campaigns

[13] https://odz.sk/zakaz-diskriminacie-z-pohladu-judikatury-europskeho-sudu-pre-ludske-prava-2/

[14] https://hrot.info/manipulacie/2546-su-majitelia-esetu-oligarchovia

[15] https://hrot.info/portret/2540-matus-vallo-pod-lupou

[16] https://hrot.info/udalosti/2559-financovanie-prezidentskych-volieb-ako-peniaze-robia-politiku

[17] https://viaiuris.sk/o-nas/dokumenty/

The Office under the leadership of the current chair also cooperation with the Stop Corruption Foundation,[18] which is financed primarily by one of ESET's founders[19] who is also a co-owner of a a progressive media outlet along with sponsors of political entities opposing the government. [20] [21] [22] Apart from fighting against corruption, the Stop Corruption Foundation has openly supported and actively mobilized people for protests against the current government[23] and has been funded by US government funds during the Biden administration under a program that specifically states as its goal "the achievement of U.S. foreign policy goals and objectives, advancing national interests, and enhancing national security by informing and influencing foreign publics".[24]

Given that many cases handled by the Office in recent years had a direct impact on high-level politics (in particular the "Čurillovci" case and the conflict with the Ministry of the Interior) and were strongly communicated and politicized in public discourse, it is not possible, in light of the above-mentioned facts, to regard the current Chair as independent and impartial.

Representatives of whistleblowers within the civic association Union for the Legal Protection of Whistleblowers are also highly critical of the activities of the Office. They have pointed out that the Office's actions often turned against those whom it was supposed to protect and support. It was precisely this situation that led whistleblowers to join together and establish a civic association in order to help one another. According to the Union, the Office was responsible for the following serious failings:

- violations of the rights of persons under protection and the resulting necessity for them to defend themselves in court against the Office that is meant to protect them;
- insufficient communication with whistleblowers;
- a minimal number of reviews of employers' procedures despite requests from whistleblowers;
- the provision of information and written opinions to the opposing party in proceedings before the Office that were conducted solely in an administrative manner, without on-site verification;
- repeated suspicions of political influence and preferential treatment of certain whistleblowers, as well as failures in protection and harm to the position of several whistleblowers;
- on the other hand, the granting of additional protection by the Office itself to criminally prosecuted investigators.[25]

[18] https://pucung.sk/ The Office is a partner of the "anti-corruption festival" of Stop Corruption Foundation
[19] https://zastavmekorupciu.sk/o-nas/
[20] https://www.aktuality.sk/clanok/739336/davaju-statisice-eur-a-hovoria-ze-za-to-nechcu-nic-podnikatelia-ktori-platia-politikov/#:~:text=Pred%20troma%20rokmi%20prispel%20sumou%2072%20000%20eur%20Progres%C3%ADvnemu%20Slovensku.%20Bolo%20to%20e%C5%A1te%20v%20%C4%8Dase%2C%20ke%C4%8F%20bolo%20PS%20len%20ob%C4%8Dianskym%20zdru%C5%BEen%C3%ADm%20a%20nie%20politickou%20stranou.
[21] https://dennikn.sk/o-denniku-n/
[22] https://web.archive.org/web/20200229083216/https://profil.progresivne.sk/darcovia
[23] https://www.instagram.com/nadacia_zastavmekorupciu/p/DGN6PvAKBXd/
[24] https://www.usaspending.gov/award/ASST_NON_SLO10021GR3025_1900
[25] https://www.topky.sk/cl/10/9265519/Drsne-slova-oznamovatelov--Urad--ktory-ich-mal-branit--im-vraj-ublizoval--Pozaduju-zasadnu-prestavbu

The Constitutional Court has currently suspended the effectiveness of the proposed law. The Constitutional Court ruled that if the suspension were not granted and the proposal were later approved, three different legal regulations on the establishment of the office would apply in a short period of time, which would negatively affect the legal certainty of whistleblower protection. If the Constitutional Court later rules that the law is in accordance with the constitution, there will only be a temporary postponement of the new regulation, which will not cause as much damage as the opposite scenario (point 86 of the ruling of the Constitutional Court PL. ÚS 19/2025-48).
In conclusion, it can be said that while not suspending the effectiveness of the law could lead to irreparable consequences (abolition of the institution, uncertainty for whistleblowers), suspending its effectiveness would not cause any serious damage, but would only temporarily postpone the political intention of the legislator. Therefore, the interest in protecting legal certainty and constitutionality prevailed over the interest in the immediate implementation of the law.

Ministry of Interior: The Measure of the Minister of Interior No. 144 of 28 August 2019 on the Anti-Corruption Programme, as amended (hereinafter referred to as "Measure No. 144/2019") is published on the official website of the Ministry of Interior, available at https://www.minv.sk/?protikorupcny_koordinator_zakladne_informacie&subor=531562), and is also published on the intranet for the employees of the Ministry.

Within the Police Force, the Criminal Police Department of the Presidium of the Police Force is responsible for the "Action Plan for the Prevention of Corruption in the Police Force" developed in 2020 and cooperates with the Bureau of the Inspection Service in identifying corruption risks within the Police Force and proposing anti-corruption measures for their elimination.

Measure No 144/2019 established a **Working Group for Ensuring the Implementation of the Tasks of the Anti-Corruption Programme** (hereinafter referred to as the "Working Group")**, consisting of responsible representatives of the individual departments within the remit of the Ministry** (Article II(b) of Measure No 144/2019). The Working Group meets as necessary, at least once a quarter, and is chaired by the Anti-Corruption Coordinator. The Working Group is involved in the implementation of the tasks related to anti-corruption issues and its objective is to coordinate activities, to regularly inform the departments under the jurisdiction of the Ministry of Interior of the SR about the anti-corruption policy, to create a platform for sharing examples of good practice between the departments and to address issues related to the implementation of the anti-corruption policy. Members of the working group are obliged to **ensure the implementation of the anti-corruption policy within the department they represent** and they take the initiative to implement activities within the departments in the field of anti-corruption policy (e.g. training, seminars, campaigns, etc.). The duties and tasks of the members of the Working Party are laid down in Measure 144/2019. The current list of the members of the Working Group can be found at link: Working Group for Ensuring the Implementation of the Tasks of the Anti-Corruption Programme of the Ministry of Interior, Ministry of Interior of the Slovak Republic.

On the basis of the identified needs to strengthen crime prevention at the national level, the Crime Prevention Bureau of the Ministry of Interior of the Slovak Republic (hereinafter referred to as the "Crime Prevention Bureau of the MoI SR") was established on 15 October 2025, which, in accordance with the internal regulations, ensures the **fulfilment of the tasks**

of the Anti-Corruption Coordinator of the Ministry of Interior (hereinafter referred to as the "Anti-Corruption Coordinator").

The **internal control mechanisms for the management of corruption risks** and the **template form for the identified corruption risk** were also issued by Measure No 144/2019. Accordingly, the identification of corruption risks through the Corruption Risk Identification Form is carried out as necessary, at least once a year.

The Anti-Corruption Programme takes into account the state of play in the implementation of anti-corruption matters and addresses the needs of individual organisational units within the Ministry's remit, which are identified annually through the Working Group. It incorporates the **insights and suggestions offered by the staff** and builds on good practice acquired from abroad.

The objectives of the Anti-Corruption Programme are based on the corruption risks identified at the level of the Ministry, to be monitored their fulfilment on an annual basis:

- Objective No.1 Reduce the opportunities for corruption risks to arise and exist,
- Objective No.2 Raise staff awareness and strengthen staff integrity,
- Objective No.3 Strengthen the integrity of the organisation,

The Crime Prevention Bureau of the MoI SR prepared an internal document **"Report on the adopted measures and identified corruption risks in 2020-2025",** which was presented to the members of the Working Group to ensure the fulfilment of the tasks set out in the Anti- Corruption Programme of the MoI SR.

For the purpose of enhancing the detection and investigation of the most serious forms of corruption, the staff of the UBOK has been strengthened by establishing the Anti-Corruption Analytical Centre within the Anti-Corruption Unit of the UBOK of the Presidium of the Police Force (hereinafter referred to as "the Anti-Corruption Unit of UBOK"), which assesses the seriousness of cases, with the most serious cases remaining at the level of the UBOK of the Presidium of the Police Force, and the less serious cases delegated to the Regional Directorates of the Police Force.

The Anti-Corruption Analytical Centre is responsible for selecting factually and legally straightforward cases of corruption and their subsequent referral to the Regional Directorates of the Police Force, since based on past experience we know that those most straightforward cases are the highest in number. At this point, it is also worth mentioning that, in other countries, simple crimes are routinely investigated by ordinary police services, which correspond to the level of Regional Directorates of the Police Force and District Directorates of the Police Force in the Slovak Republic. After the referral of a complaint to a lower unit, the UBOK requests feedback on how the case was decided and records the matter in the knowledge pool. In the referred cases, the UBOK provides assistance and methodological guidance to the Regional Directorate of Police Force and the District Directorates of the Police Force.

In the course of investigations and operational and search activities, the Anti-Corruption Unit of UBOK cooperates with all central government bodies. The cooperation of the UBOK with the EPPO and Regional Prosecutor's Offices takes place almost on a daily basis, and is at the highest professional level. The investigators of the Anti-Corruption Unit of UBOK proceed strictly in accordance with the instructions of the supervising prosecutor when investigating individual cases. Taking into account the specialisation of the investigators assigned to the UBOK, including those of the Anti-Corruption Unit of UBOK, it can be stated that the cooperation in criminal proceedings in terms of expertise is far more effective. Within the framework of foreign cooperation, the Anti-Corruption Unit of UBOK makes use of the analytical activities of the European Anti-Fraud Office (OLAF), expert activities through EUROPOL and routine cooperation with police attachés. The police officers assigned to the UBOK hold expert positions, for example, within the preparatory bodies of the EU Council, in EU networks, agencies and bodies, and further pass on the acquired knowledge for future official use, thus maintaining continuity in the effective transfer of information. They also evaluate information relating to the identified tasks or recommendations with a view to taking further action following their effective execution and subsequent implementation. Representatives of the UBOK also have access to the MATRRIX platform, which collects information on ongoing corruption cases of foreign public officials at the international level. Access to this platform represents a significant and valuable source of operational and analytical information that is used in the identification and detection of potential cases of corruption involving foreign public officials.

In 2025, the UBOK recorded 170 cases of corruption offences, 149 of which are new cases. Within the National Crime Agency of the Police Force (hereinafter referred to as the "NACA"), corruption offences were investigated by the so-called "third departments", i.e. the 3rd Investigation Department and the 3rd Operational Department of the Bratislava, West, Central and East Divisions.

The number of positions (the first figure in the second column) and the number of NACA police officers assigned to the 'third departments' as of 31 August 2024 (the second figure in the second column):

The number of positions and the number of police officers assigned to the 'third' divisions

3. Operational Department of the NACA’s Bratislava Division	15/15
3. Investigation Department of the NACA’s Bratislava Division	15/15
3. Operational Department of the NACA’s Division West	13/12
3. Investigation Department of the NACA’s Division West	13/13
3. Operational Department of the NACA’s Division Central	13/13
3. Investigation Department of the NACA’s Division Central	13/12
3. Operational Department of the NACA’s Division East	12/11
3. Investigation Department of the NACA’s Division East	12/12

The UBOK is not divided into West, Central and East Divisions in the way the NACA was organised as of 31 August 2024. Individual specialised units, such as the Anti-Corruption Unit of UBOK, are divided into West, Central and East Divisions. The leaderships of the individual divisions and the central leadership in Bratislava ensure the coordination of investigations between the divisions within the individual units of the UBOK and guarantee that parallel investigations are not carried out.

After the organisational change, which resulted in the creation of three separated services from 1 September 2024, employment status was changed either by transferring or reassigning members of the Police Force in the following numbers - 47 members of the Police Force from the former NACA were assigned to individual Regional Directorates of the Police Force in the Slovak Republic and 67 members of the Police Force from the former NACA were assigned to individual District Directorates of the Police Force in the Slovak Republic. The outflow of members of the Police Force, including members assigned to the NACA and the UBOK of the Police Force, also occurred as a result of the indexation of police pension. The indexation rate for 2023 was 10% and for 2024 it was 14%, which resulted in many officers applying for retirement due to having reached the required number of years of service and thus becoming eligible for a pension.

After the dissolution of the NACA of the Police Force, another significant change took place - the transfer of the subject-matter jurisdiction (competence) to the Regional Directorates of the Police Force. The reassignment concerned members of the Police Force who had been recognised as an asset to the Regional Directorates and the District Directorates of the Police Force, while their expertise and place of work were carefully considered. The place of work of the police officers remained unchanged, apart from a minimal number of individual cases. Due to the change in subject-matter competence the police departments were reinforced in the regions with experienced investigators and experts. The Regional Directorates of the Police Force are subject-matter competent to investigate offences of corruption, which are regulated in the Special Part of Act No 300/2005 Coll., the Criminal Code, in Chapter Eight - Criminal Offences against Public Order, in Title Three - Corruption, from Section 328 to Section 336d of the aforementioned Act. The subject-matter jurisdiction of the UBOK is specifically defined by the Regulation of the Ministry of Interior of the Slovak Republic of 27 May 2025 on the activities in the detection of criminal offences and on the procedure in criminal proceedings.

As regards the issue of redistribution of investigation files, we would like to state that there was a certain number of files that were transferred to the Regional Directorates of the Police Force; these were minor crimes or proceedings, and the need to transfer the investigation files resulted also from the change in the subject-matter jurisdiction. The investigation files that were previously assigned to investigators who are no longer working at the UBOK of the Police Force were reassigned to equally competent investigators with adequate experience in the field of investigation. The investigators of the UBOK continued in the proceedings without interruption, as the reorganization or their transition from the NACA to the UBOK did not affect the investigation of the cases in question in any way. At this point, it is necessary to point out that the Regional Directorates of the Police Force have specialised investigators for particular areas of criminal offences, as the Criminal Police Departments of the Regional Directorates of the Police Force are organised into divisions according to the areas of criminal offences. Serious cases of corruption are dealt with by the Anti-Corruption Unit of UBOK of the Police Force, if they are supervised by the EPPO or if the UBOK of the Police Force exercises its jurisdiction of choice. Regional Directorates of the Police Force deal with the investigation of less serious corruption cases. District Directorates of the Police Force did not and do not have in their subject-matter competence the investigation of corruption offences. The majority of investigators who, with the exception of one, were formerly assigned to the NACA of the Police Force, have been assigned to the UBOK of the Police Force, thus ensuring uninterrupted continuity in the investigation of the cases in question.

Following the adopted legislative and institutional changes and based on the recommendations of GRECO of the Council of Europe[26] (the evaluation mission in Slovakia took place on 18 - 19 February 2025), the Draft Order of the President of the Police Force on the Annual Plan of the Main Tasks of the Presidium of the Police Force for 2026 was amended to contain the task to "***develop, publish and implement a formal plan for the specialisation and further professional development of investigating police officers in the field of corruption crimes***", which will include specific job descriptions and specific, measurable, achievable, realistic and time-bound objectives.

In terms of formalising the specialisation of individual police officers who detect and investigate corruption-related criminal activity, we consider it necessary to draw attention to the internal hierarchical structure of the Office for the Fight against Organised Crime itself. The Office for Combating Organised Crime integrates an anti-corruption unit directly into its own organisational structure. The name itself suggests that this unit is narrowly specialised in detecting and investigating corruption within the line management structure. The specialisation of the police officers of the Office for Combating Organised Crime is also expressed in the relevant Regulation of the Ministry of the Interior of the Slovak Republic No. 56 of 27 May 2025 on activities in the detection of criminal offences and on criminal proceedings, and previously in Regulation No. 175/2010 of the Ministry of the Interior of the Slovak Republic on the definition of the competence of police units in the detection of criminal offences, the identification of their perpetrators and the procedure in criminal proceedings.

The police force, in particular the Office for Combating Organised Crime, has carried out a number of activities in the field of training. We are submitting the material in the annex, as it is relatively extensive. The activities mentioned include the organisation of and participation in several domestic and foreign events by police officers specialising in corruption, with a focus on more effective specialisation of police officers. These activities were carried out in the Slovak Republic with international participation, and a number of police officers also participated in several foreign training courses, seminars and other educational activities on behalf of the Office for the Fight against Organised Crime.

The police, within the framework of regional directorates, are systematically working on the specialisation of individual investigators and operational police officers, as evidenced by several training courses with foreign participation, as well as several meetings at the internal and external national level. In this regard, we are submitting the annexes for verification of the circumstances described.

The UBOK P PZ was established on 1 September 2024 on the basis of organisational measure No. Following the changes after the reorganisation of the Police Force Presidium, which came into force on 1 September 2024, UBOK P PZ is, according to Article 5 of the Regulation of the Ministry of the Interior of the Slovak Republic of 27 May 2025 on activities in the detection of criminal offences and on the procedure in criminal proceedings (hereinafter referred to as the "Regulation on Jurisdiction"), has jurisdiction over:

a) investigating and detecting criminal offences committed by an organised group or dangerous group pursuant to Section 141 of Act No. 300/2005 Coll. Criminal Code

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(hereinafter referred to as the "Criminal Code") on the basis of selective jurisdiction,

b) **investigating and detecting criminal offences within the jurisdiction of the European Public Prosecutor's Office**,

c) detecting and investigating corruption offences that have been detected through its own activities, unless they are dealt with by the unit referred to in Article 2(k),

d) detecting and investigating criminal offences that have been detected through its own activities
and the implementation proposal has not been forwarded to the competent department, unless the department referred to in Article 2(k) is dealing with them,

e) detection and investigation of criminal offences of legalisation of proceeds from criminal activity pursuant to Sections 233, 233a and 234 of the Criminal Code related to the criminal offences referred to in points (a) to (d) and h),

f) investigating criminal offences related to the criminal offences referred to in points a) to d) and h) if the conditions for joint proceedings under Section 18 of Act No. 301/2005 Coll. Criminal Procedure Code (hereinafter referred to as the "Criminal Procedure Code") are met,

g) conducting financial investigations and activities related to the siphoning off of assets under a special regulation, in criminal offences within its jurisdiction,

h) criminal offences which otherwise fall within the jurisdiction of the criminal police department of the regional directorate, the criminal police department of the district directorate or the district department, if required by the nature of the case in view of its seriousness, extent, complexity or other important interest, if so determined by the President of the Police Force (hereinafter referred to as "PZ") at the proposal of the director of the unit exercising selective jurisdiction.

According to Article 24(1) of the P PZ Regulation on the organisational rules of the P PZ UBOK P PZ, in particular:

a) specialises in combating the most serious criminal offences and, on the basis of selective jurisdiction determined in accordance with internal regulations, carries out the detection and investigation of, in particular, criminal offences committed by organised groups, criminal groups, premeditated murders, violent acts, extortion, the use of booby-trapped explosive devices, property and economic crime,

b) obtains, collects, analyses and evaluates information relating to the detection, documentation and investigation of criminal activity within the jurisdiction of the Office for Combating Organised Crime,

c) prepares analyses, forecasts and generalisations, which it provides for decision-making in relation to the elimination of criminal activity within the jurisdiction of the Office for Combating Organised Crime,

d) investigates and detects criminal offences within the jurisdiction of the European Public Prosecutor's Office, e) performs tasks in the area of combating the legalisation of proceeds from criminal activity,

f) investigates and detects criminal offences of legalisation of proceeds from criminal activity in accordance with a special regulation,21) if it also investigates the predicate offence,

g) **detects and investigates corruption offences on the basis of selective jurisdiction determined by internal regulations,**

h) performs statistical and record-keeping tasks in relation to corruption,

i) conducts financial investigations in accordance with a special regulation in connection with the detection and investigation of criminal offences on the basis of selective jurisdiction determined by internal regulations,

j) **methodically guides and coordinates the activities of the criminal police departments of regional directorates in the process of detecting, investigating, verifying and documenting criminal offences relating to the damage of the financial interests of the European Union and criminal offences of corruption and promotes the use of the most effective forms, methods and means in the fight against such criminal activity in their activities.**

For your information, we would also like to add that the Slovak Republic is currently in the process of evaluation within the 4th phase of monitoring the implementation of the obligations arising for the Contracting Parties from the OECD Anti –Bribery Convention. As part of this process, the Slovak Republic prepared and submitted responses to an evaluation questionnaire, which constitute the basis for the subsequent assessment of the legislative, institutional and application framework in the area of combating bribery of foreign bribery in international business transactions. From 19 to 23 January 2026, an assessment visit by Working Group on Bribery experts will take place on the territory of the Slovak Republic, during which discussions will be held with representatives of the relevant public authorities as well as with representatives of other relevant stakeholders, including representatives of the business community, civil society and the media. The evaluation report of the Slovak Republic will be adopted in June 2026.

<u>Cooperation with the European Public Prosecutor's Office (EPPO)</u>
In the framework of mutual cooperation with the European Public Prosecutor's Office (hereinafter referred to as "EPPO"), the UBOK assesses the cooperation with EPPO prosecutors as extremely positive and highly professional.

Statistical indicators for the year 2025:
a) the number of registered criminal cases under the jurisdiction of the EPPO: 112
b) initiated prosecutions in the registered criminal cases: 112
c) complaints received, sent to the EPPO for consideration: 16
(criminal complaints where the supervision of the EPPO is an option are sent directly from the relevant regional prosecutor's office)
d) charges brought in cases falling within the competence of the EPPO: 9
e) cooperation with OLAF in cases falling within the competence of the EPPO: 0
f) assistance in cross-border investigations: 47

Investigators and operational officers of the Police Force assigned to the Anti-Corruption Unit, Financial Police Unit and Financial Investigation and Analysis Unit of the UBOK are available for the needs of the EPPO. The number of <u>Operational officers of the Police Force</u> who detect criminal offences falling within the competence of the EPPO are assigned to the relevant units is 74. The number <u>of investigators</u> who detect crimes falling within the competence of the EPPO is 131. At the same time, the UBOK has 27 <u>analysts</u> at its disposal for the investigation of the above-mentioned crimes affecting the interests of the EU.

During her visit to Slovakia, European Chief Prosecutor Laura Kövesi met with the President of the Slovak Police Force, Gen. JUDr. Jana Maškarová and the Director of the Bureau for Combating Organised Crime (UBOK) of the Presidium of the Police Force, Lt. Col. Maroš Kubala, M. A. The meeting focused on setting up further constructive cooperation between the Police Force and the EPPO. The main themes of the working meeting were:

- reviewing and setting up cooperation mechanisms for the detection and investigation of organised financial and tax crime, including the abuse of subsidies;
- strengthening coordination between the EPPO and the Slovak police;
- allocating selected investigators for the needs of a specialised EPPO unit, which will cooperate in detecting economic crime.

Following the conclusions of the above-mentioned meeting, the Police Force implemented the following objective in the Draft Order of the President of the Police Force on the Annual Plan of the Main Tasks of the Presidium of the Police Force for 2026: ***to adopt measures aimed at strengthening the personnel and professional capacities of the units of the Bureau for Combating Organised Crime in accordance with the competence of the European Public Prosecutor's Office***

GPO: In 2025, prosecutors actively exercised **prosecutorial supervision in several high-profile corruption cases**, when conducting detailed consultations with investigators, issuing written instructions on further procedures, and issuing relevant decisions leading to the filing of indictments for these serious corruption cases. **Prosecutors of the Serious Crime Division of GPO (hereinafter referred to as "OZK") and former SPO prosecutors also participated in the main hearings in several serious corruption criminal cases**, some of which were legally concluded with a finding of guilt and the imposition of sentences. **In 2025, the OZK prosecutors did not record any undue interference in the investigation of corruption criminal cases or any cases of unlawful cancellation of final decisions on investigation and prosecution**. Such suspicions do not arise neither from the submitted written reports of the regional prosecutors' offices.

GPO briefly commented on the changes related to other departments (especially the Ministry of the Interior) in other points (I A c, II C), but it is appropriate for the Ministry of the Interior to explain this topic in more detail. As for the prosecutor's office, based on the order of the GPO and, subsequently in December 2024 also based on the amendment to the Act on the Prosecutor's Office, the Serious Crime Division ("**OZK**") was established, which **currently (after transformation into the Serious Crime Department) has 10 prosecutors. 8 of them were prosecutors of the SPO before its abolition and took over all active cases, especially the most serious corruption cases, which they supervised in the past.** Subsequently, on 15 May 2025, the order of the Prosecutor General of the Slovak Republic No. 2/2025 on the organization, management and control of work in the prosecutor's office came into effect, which transformed the Serious Crime Division into the Serious Crime Department, i.e. into a higher organizational unit of the GPO. The department is headed by the director of the department and his deputy. All prosecutors of the original Serious Crime Division were continuously transferred to the department, while from 01 January 2026, one prosecutor from the Regional Prosecutor's Office Bratislava was temporarily accepted for a professional internship in the department. The establishment of the Serious Crime Department or its transformation into a higher organizational unit of the prosecutor's office demonstrates that the GPO places great emphasis on the need to carry out high-quality supervisory and controlling activities of the prosecutor's office in cases of corruption and similar serious cases.

Specialisation

Those corruption cases that, on the day of the abolition of the SPO, were in the stage after the completion of the investigation or in the stage after the indictment was filed with the court, remained, based on the granted exception of the Prosecutor General of the Slovak Republic, under the direct supervision of former prosecutors of the SPO, who continued mainly in hearings before the Specialized Criminal Court in 2025.

Currently, based on the law, supervision in specific new corruption cases is carried out by specialized prosecutors of regional prosecutors' offices, while supervision over each such new case is carried out by OZK prosecutors, who, in the case of extremely serious corruption cases, can request the General Prosecutor's Office to determine an exception and take over such a case under direct supervision. This preserves the expertise and continuity of prosecutorial supervision in serious corruption cases after the abolition of the SPO.

Training as an immanent task
As part of the fulfillment of tasks in the field of methodological guidance of subordinate prosecutors' offices, the OZK provided several professional training courses for prosecutors of regional prosecutors' offices, namely the following:

17-18.03.2025 - Stará Lesná - Coordination and educational event focused on detecting and proving corruption and damaging the financial interests of the EU
Regional Prosecutor’s Office (“KP”) Prešov, KP Košice, Regional Police Force Directorate (“KR PZ”) Prešov and KR PZ Košice

08-09.04.2025 - Stará Lesná - Seminar - detecting, proving corruption and damaging the financial interests of the EU - KP PO, KP KE + district prosecutor's offices

29.04.2025 - Interdepartmental working meeting at KP Bratislava focused on detecting, proving corruption and damaging the financial interests of the EU - KP BA, KR PZ BA

30.04.2025 - Interdepartmental working meeting at KP Nitra – detecting, proving corruption and damaging the financial interests of the EU - KP Nitra, KP Trnava, KR PZ Nitra

06-07.05.2025 - Krpáčovo - Seminar revealing, proving corruption and damaging the financial interests of the EU for prosecutors KP BB, KP ZA, KP TN

15.05.2025 - Interdepartmental working meeting revealing, proving corruption and damaging the financial interests of the EU - KP Trnava, KP Nitra, KR PZ Trnava

19.05.2025 - Donovaly - Instructional and methodological meeting focused on revealing, proving corruption – Office of Fight against Organized Crime (“UBOK”) KR PZ - Slovakia

10-11.06.2025 - Krpáčovo - Seminar on revealing, proving corruption and damaging the financial interests of the EU - KP BA, KP TT, KP NR

11.-12.09.2025 - Bratislava Police Academy - UBOK Seminar - application challenges in detecting and investigating corruption - UBOK KR PZ, KP, OZK – Slovakia, State Prosecutor's Office - Czech Republic

20-21.10.2025 - Omšenie - Judicial Academy - Seminar - prosecutor's supervision in matters within the competence of the Specialized Criminal Court - prosecutors KP - Slovakia

OZK vs OLAF

Regarding **cooperation between the GPO and the European Anti-Fraud Office (OLAF),** the GPO has concluded an Agreement on Cooperation with the Government Office of the Slovak Republic in the protection of the financial interests of the European Union and in the detection and sanctioning of unlawful acts that could result in a threat to these interests (hereinafter referred to as the "Agreement"). Pursuant to the aforementioned Agreement, the former Special Prosecutor's Office of the General Prosecutor's Office of the Slovak Republic submitted to the Government Office of the Slovak Republic, via the Control and Combating Corruption Section, the Central Liaison Unit for OLAF and Combating Corruption (hereinafter referred to as the "Central Liaison Unit"), within 30 calendar days after the end of each calendar quarter, written information on the initiation of criminal prosecution, the current status of criminal prosecution and the manner of its termination for acts qualified as criminal offences referred to in Article 1 of the Agreement, and at the same time, the SPO provided the Central Liaison Unit with copies of legally binding court decisions leading to convictions in these criminal cases. Since, after the abolition of the SPO, the Prosecutor General established the Serious Crime Division (currently the Serious Crime Department), whose organizational unit performs a significant part of the tasks originally performed by the SPO, and part of the tasks related to OLAF were also included in its competence. Based on the above, **the Head of the OZK took the necessary measures to regularly submit summary reports for individual regional prosecutors' offices on the initiation of criminal prosecution, on the current status of criminal prosecution, including information on the current status of criminal prosecution in matters transferred to the relevant regional prosecutor's offices after the abolition of the SPO and on the manner of its termination for acts qualified as criminal offences falling within the interest of OLAF.**

OZK vs EPPO

With regard to ensuring measures for effective cooperation with the European Public Prosecutor's Office, it should be noted that in connection with the wording of Articles 24(2) and 27(7) of Council Regulation (EU) No. 2017/1939 of 12 October 2017 (hereinafter referred to as the "Regulation") implementing enhanced cooperation for the purposes of establishing the European Public Prosecutor's Office, as well as on the basis of amendments to the Criminal Code No. 40/2024 Coll. and 47/2024 Coll., prosecutors have an obligation in criminal cases that may fall within the competence of the European Public Prosecutor's Office after the amendment to immediately inform the Department of European Delegated Prosecutors of new facts on the basis of which they will decide whether to exercise their authority. The aforementioned obligation arises from Articles 24, 27 of the Regulation as well as from Article 2(4) of the Order of the Prosecutor General of the Slovak Republic, Order No. 37/2024 of 28 August 2024 on the procedure of prosecutors in matters falling within the competence of the European Public Prosecutor's Office and on cooperation with the European Public Prosecutor's Office, according to which, if a prosecutor discovers during criminal proceedings facts on the basis of which the European Public Prosecutor's Office could exercise its powers, he shall immediately notify the Department of European Delegated Prosecutors of the discovered facts containing the data referred to in Article 5 of the said order and at the same time submit the file. In order to ensure the proper performance of the above duties, **the Head of the Serious Crime Department issued an instruction and guidance to individual regional prosecutors in August 2024 to ensure the review of all files that could fall within the competence of the European Public Prosecutor's Office after the amendment to the Criminal Code, and in the event that it is found that the case may fall within the competence of the European Public Prosecutor's Office, to submit the newly discovered facts to the Department of European Delegated**

Prosecutors together with the supervisory file and the investigation file for the purpose of deciding on the exercise of the right to exercise its authority and to inform the Serious Crime Department of the General Prosecutor's Office of its procedure without delay. Professional cooperation between the EDP and the General Prosecutor's Office in resolving specific criminal cases is also ensured and actually functional in the initial stages of criminal proceedings.

Functional independence
Regarding the **issue of guarantees of functional independence** of bodies entrusted with the prevention and detection of corruption, it is possible to state from the OZK that it is not possible to comment on the guarantees of functional independence of bodies entrusted with the prevention of corruption, since the prevention of corruption does not primarily fall within the competence of this department. Regarding the functional independence of bodies detecting corruption, it is necessary to state that prosecutors of the OZK are directly subordinate to the First Deputy Prosecutor General and the Director of the OZK within the management activities, while all legal guarantees of independence of prosecutors apply to them in accordance with the legal regulations of the Slovak Republic. Subordinate Regional Prosecutor's Offices, with regard to the supervision of corruption cases, fall under the supervisory activity of the OZK. Pursuant to Section 6 of Act No. 153/2001 Coll. on the Prosecutor's Office, as amended, a superior prosecutor may not issue an instruction to a subordinate prosecutor not to initiate criminal prosecution, not to bring charges, not to file a motion to take the accused into custody, to refer the matter to another authority for consideration, to discontinue criminal prosecution, not to file an indictment or an ordinary or extraordinary remedy to the detriment of the accused. Neither can the superior prosecutor issue an instruction to a subordinate prosecutor not to file a motion to initiate proceedings before a court, not to enter proceedings before a court, not to file an appeal against a court decision under special regulations, 2a) not to file a prosecutor's protest or not to file a prosecutor's warning.
Neither can the superior prosecutor perform acts that he cannot impose on a subordinate prosecutor under paragraphs 8 and 9, and neither can the superior prosecutor decide that they be performed by another subordinate prosecutor; they can only be carried out by the immediate superior prosecutor. The above-mentioned legal provisions guarantee a significant degree of independence of supervisory prosecutors from negative interference by superiors.

The independence of corruption investigations on the part of investigators is guaranteed, among other things, by prosecutorial supervision of independent prosecutors, and if the supervising prosecutor discovers that, for example, the superiors of the investigator are interfering with the independence of the investigation, he has several legal options at his disposal to prevent this interference.

As for the measures planned in the strategic anti-corruption framework - the OZK/GPO does not have such information.

B. Prevention

Ministry of Interior of the Slovak Republic: With a view to enhancing cooperation and the process of detection and clarification of criminal activities within the competence of the EPPO, on 30 June 2025, the Criminal Police Department of the Presidium of the Police Force issued a guideline on the law enforcement authorities' procedure when a criminal offence

within the competence of the European Public Prosecutor's Office is suspected to have been committed. This guideline regulates the procedure of a police officer upon receipt of a criminal complaint regarding a suspected criminal offence within the competence of the EPPO, the procedure for suspected criminal offences within the competence of the EPPO which have been detected by operational activity or established in some other way than on the basis of a criminal complaint, the procedure of the EPPO prosecutor and his powers, the range of criminal offences falling within the competence of the EPPO, and other facts worthy of special consideration.
On 11-12 September 2025, an international expert seminar entitled *"Application Challenges of Detection and Investigation of Corruption and Related Crimes"* was held at the national level, and was organised by the UBOK with the participation of representatives of the EPPO, enabling experts from the practical field to exchange experiences and discuss specific solutions in the field of fighting corruption and related crimes, with the participation of representatives of the EPPO.
The UBOK nominated police officers for trainings under the auspices of the EPPO, which took place in 2025. At the same time, on the basis of the already announced offer of EPPO Academy courses for 2026, the UBOK has already nominated its representatives for the scheduled courses.
With regard to measures aimed at the protection of whistleblowers, we would like to point out that, within the framework of the national project "Increasing the resilience of soft targets through strengthening professional capacities and crime prevention services in the Slovak Republic", the Ministry of Interior of the Slovak Republic is conducting thematic seminars focusing, among other things, on raising awareness on the issue of protection of teaching and non-teaching staff in the event that they report a criminal offence or an administrative offence identified in the course of their activities in the school environment and are therefore threatened with retaliatory action by their employer.
Within the Ministry of Interior of the Slovak Republic, the Bureau of Inspection Service has been appointed as the "responsible person" under the Whistleblower Protection Act, which is obliged to investigate a whistleblowing report and to notify the whistleblower of the outcome of the investigation and the action, if any, taken as a result of the investigation of the whistleblowing report within 90 days from the acknowledgement of the receipt of the whistleblowing report, or, if the receipt of the whistleblowing report has not been acknowledged, within 90 days from the expiry of the period of seven days after the receipt of the whistleblowing report.
The Bureau of the Inspection Service, within the framework of the internal system for investigation of whistleblowing reports pursuant to Section 10(1) of the Whistleblower Protection Act and the Regulation of the Ministry of Interior of the Slovak Republic on the internal system for investigation of whistleblowing reports, registers these reports in the scope of its legal obligation. By assessing the factual circumstances, it evaluates them within the meaning of the Whistleblower Protection Act, investigates them and refers them to the competent State authorities, or evaluates them outside the meaning of this Act and further deals with them within the limits of other legal regulations.

The statistical indicators of the Bureau of the Inspection Service show that in the second half of 2025, 7 whistleblowing reports were received under the Whistleblower Protection Act; of this number, 3 were assessed in terms of their subject matter within the meaning of the Whistleblower Protection Act.
Promoting transparency, integrity and accountability among staff was done through information and training activities throughout 2025.

The **information activities** are mainly carried out **internally** due to the Anti-Corruption Coordinator's objective and competence to act and promote an anti-corruption culture within the Ministry of Interior. Information activities are implemented in the form of campaigns and through information materials. Campaigns are carried out by sharing anti-corruption-related content with the employees of the Ministry. Distribution is done through cooperation with the Working Group's representatives from each department. **The information campaign on the social networks of** the Crime Prevention Bureau of the MoI SR focused on the issue of **supporting the reporting of criminal activities** - the aim of the campaign was to explain the concepts related to identifying and reporting corruption, to promote cooperation and to **strengthen the ethics and integrity of** both employees and the public. Within the Ministry of Interior of the Slovak Republic, **training** is provided for two groups of employees, namely **newly hired employees** and **permanent employees**.

With a view to providing the Ministry's employees with information on the anti-corruption policy, the training material "Anti-Corruption Training Package" was created for the purpose of educating the Ministry's employees in the field of corruption prevention. The anti-corruption training package **discusses in detail the basic theoretical knowledge in the field of corruption, the anti-corruption policy of the Ministry of Interior of the Slovak Republic and the subject of reporting corruption and whistleblower protection.** The current version of the Anti-Corruption Training Package is available on the Ministry's official website and is also published for employees on the intranet site under the Anti-Corruption, CORRUPTION bookmark, together with the **codes of ethics** and the **regulation on the internal system for investigating whistleblowing reports**.

At the same time, the subject of anti-corruption education, namely the "**Anti-corruption Education Package**", is included among the voluntary topics in the preparation of the adaptation training plan for civil servants, and the employee in the performance of public service upon the commencement of the employment relationship can be presented with the same range of topics.

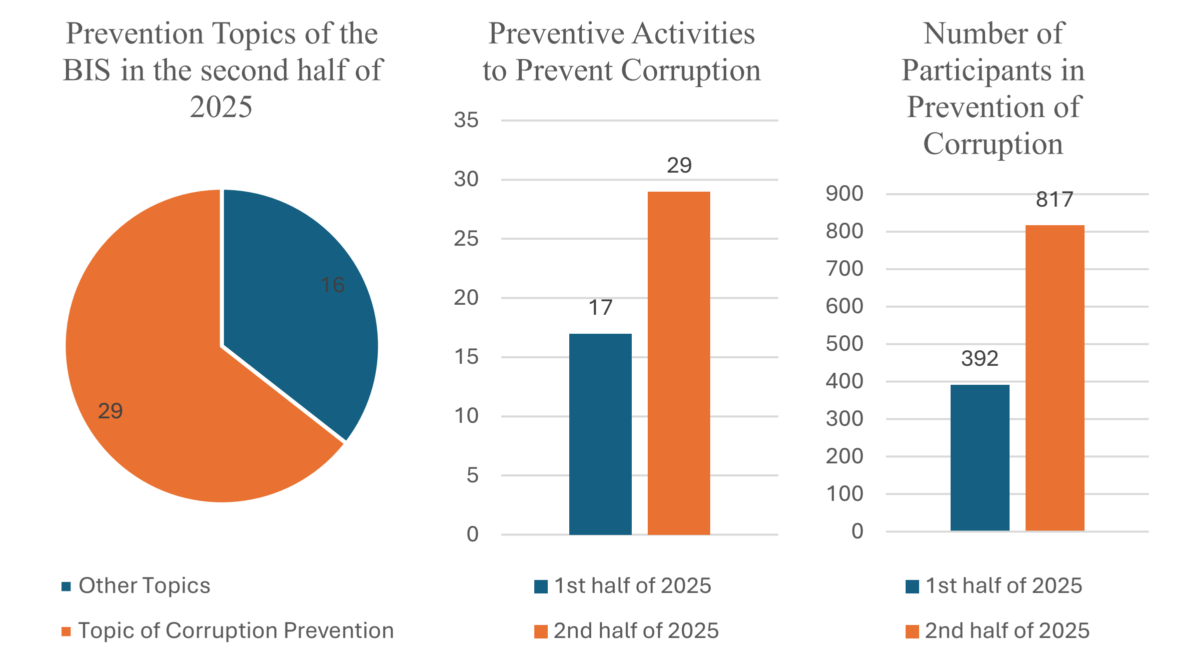
Employees of the Ministry who are not covered by the adaptation training can get acquainted with the Anti-Corruption Training Package on the intranet site as well.

The Crime Prevention Bureau of the MoI SR has modernized the established format of **online training** to increase the accessibility of education to as many employees as possible and has switched to training through the LMS - an internal Learning Management System. The training takes the form of a shorter informative course lasting up to about 1 hour, providing basic information on the topic of corruption prevention and whistleblower protection, and it consists of two blocks - presentations lasting up to about 1 hour. After listening to and reading through the individual presentations, the participant will take a short test. The first block of presentations is concluded with 10 questions, the second block with 18 questions. The above training has been developed in cooperation with the Bureau of the Inspection Service. **The e-learning training was made available to staff throughout 2025 and was attended by** a total of **2 500** civilian staff members and **6 619** police officers. Also, **in support of the anti-corruption policy**, a **personal e-mail from the Minister** was sent to all employees of the Ministry of Interior on the topic "Completion of the online training 'Prevention of corruption within the Ministry of Interior' - an important step towards a transparent Ministry".

The Crime Prevention Bureau of the MoI SR also **cooperates with the Bureau of Inspection Service**, for example, it participated in the instructional and methodological activities of **the specialised police units**, making presentations on the topics "**Prevention of corruption and the fight against corruption within the Ministry of Interior of the Slovak Republic**" and "**Implementation of the GRECO Principles - Integrity Advisors**", in total for about 230 members of the Police Force.

In addition to its priority task in the field of repression and investigation, the Bureau of the Inspection Service also carries out activities in the field of crime prevention through the Prevention and Support Activities Unit of the Organisational Department, which it has set up within its organisational structure for this purpose.
In the evaluated period of the second half of 2025, the above-mentioned workplace organised a total of 45 preventive activities aimed at the elimination of crimes committed by members of the Police Force, which amounts to 15 more preventive activities (50% increase) compared to the first half of 2025. A total of 1 176 persons participated in the above-mentioned preventive activities, which is 556 persons more (almost 90% increase) compared to the first half of 2025.
Of this number, 29 preventive activities were exclusively focused on corruption prevention, with 817 participants, which is an increase of 425 persons (108% increase) compared to the first half of 2025. Within the framework of preventive activities, the Bureau of the Inspection Service cooperated with service psychologists, the Department of Social Sciences of the Police Academy in Bratislava and the Academy of Financial Administration of the Financial Directorate of the Slovak Republic.

Number of Anti-Corruption Activities in the 1st and 2nd half of 2025



Preventive activities were primarily provided in the form of lectures focused on the individual elements of corruption offences, including practical examples of the fulfilment of their constitutive elements. The development of corruption offences within the Police Force, including related offences, was presented during the lectures. The lecturers also included the presentation of cases covered by the media, with an emphasis on the moral and ethical dimension of the performance of police activities, with reference to compliance with internal regulations and generally binding legal provisions.
The lecturing activities also included anti-corruption quizzes and discussions focused on the causes and forms of corrupt behaviour in the Police Force, the harmful consequences of corruption, as well as clarification of the differences between a bribe and a donation and instructions on how to fight corruption. As part of preventive activities, information was provided on whistleblowing, including corruption, to the Bureau of the Inspection Service,

which holds the status of a "responsible person" under the Ministry of Interior of the Slovak Republic.
With a view to strengthening the anti-corruption policy of the Ministry of Interior of the Slovak Republic as well as the professional readiness of the police officers and employees of the Ministry of Interior, the Academy of the Police Force in Bratislava together with the Crime Prevention Bureau of the MoI SR have prepared a project financed from the Internal Security Fund, in which one of the main activities is focused on supporting the measures in the fight against corruption. The project is aimed at raising the awareness of the public, employees of the public and State administration, and the professional readiness of the members of the Police Force in the field of corruption.

GPO: First of all, it should be noted that **the task of the prosecutorial bodies (the OZK, or of the regional prosecutors' offices), is not the prevention of corruption**, but its criminal prosecution, therefore the OZK participates in prevention in the broader sense of the word, mainly through lectures focused on corruption and cooperation with the Office for the Protection of Whistle-blowers.

OZK actively participates in cooperation with the Whistle-blowers Protection Office, while in criminal matters falling within the jurisdiction of the specialized criminal court, 7 applications for protection were submitted to the prosecutor in 2025, of which 5 cases were granted and 2 cases did not meet the conditions of a qualified notification under the Act on the Protection of Whistle-blowers, as a result of which protection was not provided. The non-provision of protection was reviewed by the superior prosecutor's office and was assessed as lawful and justified. From the above, it is clear that only a very small number of natural persons used the possibility of providing protection in criminal cases, while the majority of cases were granted by the prosecutor's office. The protection of whistle-blowers as currently regulated by law is an important institutional part of the fight against corruption, in which the prosecutor's office also participates.
Note: Comprehensive GPO information on the issue of whistleblowers for the prosecutor's office is provided bellow, in the section II.B 23:

Q 23 Measures to ensure whistle-blower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given)

GPO: **Information on the prosecution's actions in relation to whistle-blower protection (i.e. number of reports received and follow-up measures taken)**

The inflow of applications for protection under Act No. 54/2019 Coll. on the protection of whistle-blowers against antisocial activities and on amendments to certain acts, in the conditions of the Prosecutor's Office of the Slovak Republic and the number of protections granted in the years 2022-2025				
	2022	2023	2024	2025
Number of applications	6	37	29	19
Number of protections granted	5	35	17	10*

From the **documents provided by the particular regional prosecutor's offices for the territorial districts in their jurisdiction, it can be determined that during the calendar year 2025, a total of 19 applications were filed nationwide by natural persons for protection when reporting serious antisocial activity within criminal proceedings in a**

total of 18 criminal cases, conducted for acts provisionally legally qualified as various criminal offences (e.g. credit fraud under Section 222 of the Criminal Code, violation of obligations of trust pursuant to Section 237 of the Criminal Code, machinations in public procurement and public auction pursuant to Section 266 of the Criminal Code, damage to the financial interests of the European Union under Section 261 of the Criminal Code, abuse of authority of a public official under Section 326 of the Criminal Code, acceptance and provision of an inappropriate advantage under Section 336c of the Criminal Code, defamation under Section 373 of the Criminal Code), which were processed and in the majority of cases also decided by the relevant supervising prosecutors.

Of the 19 applications mentioned, **as of the date of provision of the supporting documents, 10 applications were decided** positively in accordance with the provisions of Section 4, Subsection 1 of Act No. 54/2019 Coll. on the protection of whistle-blowers against antisocial activities and on amendments and supplements to certain acts, as amended (i.e. on the provision of protection to whistle-blowers), **while 7 applications were not granted by the supervising prosecutors due to the lack of qualification of the submitted report (6 applications), or due to the lack of an employment or other similar relationship of the whistle-blower to the institution concerned (1 application). The remaining two applications, submitted in the second half of December 2025, had not been decided by the relevant supervising prosecutors as of the date of provision of the supporting documents.**

In terms of specific regional prosecutor's offices, in whose territorial districts there were applications for protection when reporting serious antisocial activity that constitutes a crime, the quantitative indicators summarized above are distributed as follows:

1. District of the Regional Prosecutor's Office Bratislava
• number of applications for protection: 11
• number of protected whistle-blowers: 5
• number of cases in which protection was not provided: 6

2. District of the Regional Prosecutor's Office Nitra
• number of applications for protection: 1
• number of protected whistle-blowers: 0
• number of cases in which protection was not provided: 0
** The application submitted on 17.12.2025 had not been decided on the date of provision of the documents to the relevant supervising prosecutor.*

3. District of Regional Prosecutor's Office Žilina
• number of applications for protection: 1
• number of protected whistle-blowers: 1
• number of cases in which protection was not provided: 0

4. District of Regional Prosecutor's Office Banská Bystrica
• number of applications for protection: 1
• number of protected whistle-blowers: 1
• number of cases in which protection was not provided: 0

5. District of Regional Prosecutor's Office Prešov
• number of applications for protection: 3

• number of protected whistle-blowers: 3
• number of cases in which protection was not provided: 0
** In one criminal case in which an application for protection was filed in 2024, but was not granted by the competent supervising prosecutor due to the lack of qualification of the report, the superior prosecutor examined the reasons for such a procedure in 2025, with whom he identified himself based on the results of the review obligation.*
** In another criminal case, a request was submitted by a natural person for the provision of protection for himself and a close person, which, however, had not been decided by the competent supervising prosecutor due to the transfer of the criminal case due to the jurisdiction of the European Public Prosecutor's Office for further proceedings.*

6. District of the Regional Prosecutor's Office Košice
• number of submitted requests for the provision of protection: 2
• number of protected whistle-blowers: 0
• number of cases in which protection was not provided: 1
** The request submitted on 18.12.2025 had not been decided on the date of provision of the documents by the competent supervising prosecutor.*
** In one criminal case, a request was filed for the issuance of a written confirmation that the whistle-blower had made a qualified report (Section 4(2) of Act No. 54/2019 Coll. on the protection of whistle-blowers of antisocial activities and on amendments and supplements to certain acts, as amended), which was granted by the relevant supervising prosecutor.*

Note:
Within the **internal system for reviewing notifications** pursuant to Act No. 54/2019 Coll. - **in the years 2021-2025, no facts were reported to the Prosecutor's Office from which prosecutors or employees of the Prosecutor's Office would learn in connection with the performance of their employment, profession, position or function or in connection with activities in the public interest**, relating to antisocial activities.

C. Repression
Ministry of Interior of the Slovak Republic:
The 2024 criminal law reform did not affect the investigation of corruption offences, nor did it affect the investigation of offences causing damage to public finances or EU funds.
In the case of corruption offences affecting EU funds, the limitation periods remain the same as they were before the amendments to the criminal codes (Section 87(7) of the Criminal Code). The Slovak Republic has retained the longer limitation periods for criminal offences resulting in damage to EU funds on the basis of a recommendation by the European Commission. Consequently, in relation to corruption offences affecting European Union funds, of all the EU countries, the Slovak Republic has the longest timeframe for clarification of offences detected with a longer time lag from the time of their commission.
The amendment of the criminal codes has not affected the quality of investigations in the Slovak Republic. Limitation periods have no impact on proving the facts of the case.

Presidium of the Police Force:
In the Slovak Republic, the amendment to the criminal codes has not affected the quality of investigations. The limitation periods have no impact on the establishment of the facts of the case.

The amendment reduced criminal penalties for corruption offences. At the same time, the limitation period for several corruption offences has been shortened, which in isolated cases may have an impact on the time frame available for clarifying facts that are discovered some time after they were committed. However, with regard to limitation periods, it should be noted that, following the adoption **of the amendments to the criminal codes, the Slovak Republic's limitation periods are now in line with the legislation of several European Union Member States**, such as the Czech Republic, Germany and Austria. In this context, it is important to note that the Slovak Republic is significantly aligning itself with European Union law *(in general in several areas of law)*, as evidenced by the adoption of several laws implementing numerous legally binding and non-binding legal acts resulting from European Union recommendations. The Slovak Republic has harmonised the levels of criminal penalties and the time limits for the statute of limitations with European Union standards through amendments to the criminal codes. This statement can be factually verified by comparing the wording of the Criminal Code of the Slovak Republic with the wording of the criminal codes in force and effective in the Member States of the European Union.

In the case of corruption offences **affecting European Union funds, the limitation periods remained the same as before the amendment of the criminal codes** (Section 87(7) of the Criminal Code). The Slovak Republic has retained a longer limitation period for criminal offences affecting European Union funds in line with the recommendation of the European Commission. The Slovak Republic therefore has **the longest time frame for investigating crimes** of corruption affecting European Union funds that **are discovered a long time after they were committed, compared to all other European Union countries**.

From a practical point of view, the amendment mainly affected the following provisions:
Section 87(1)(b) of the Criminal Code (as amended by Amendment No. 10/2024 Z. z., effective from 6 August 2024), according to which a maximum limitation period of ten years is set for criminal offences with a maximum sentence exceeding ten years.

In such cases, we consider the limitation period to be appropriate. We repeatedly point out that the same limitation period also applies in other European Union countries. The newly adopted criminal legislation has not caused the statute of limitations to take effect **in any significant investigated case in which the perpetrator would face a severe prison sentence.** For qualified offences with a maximum sentence of 10 years, the limitation period is 10 years. It should be noted that in practical terms, this refers to situations where evidence must be obtained within 10 years to enable charges to be brought against a specific person or persons. In the Slovak Republic, the moment of bringing charges is the stage of preliminary proceedings conducted by law enforcement authorities. This means that within 10 years, it is necessary to obtain evidence that identifies the person or persons who are most likely to have committed the crime. The moment charges are brought, the limitation period is interrupted and a new one begins, which, after charges are brought , is interrupted by the performance of any procedural act – *incidentally, in the Slovak Republic, a procedural act also includes the summoning of a witness. it is therefore clear from the above interpretation that if charges are brought, no criminal case will be time-barred*. In this context, we consider it appropriate to state that a period of 10 years from the commission of the offence is sufficient time for the criminal justice authorities to obtain evidence that may not be of sufficient quality to secure a conviction, but sufficient in quality to enable the criminal justice authorities to identify the potential perpetrator with a higher degree of probability. In this regard, we also point out that a period of 10 years is sufficient to determine whether a criminal offence has been committed and subsequently to obtain evidence that will, with a higher degree of probability, identify the person(s) who committed the unlawful act.

Section 87(1)(d) of the Criminal Code in conjunction with the criminal offences of bribery under Section 332(1), (2) and Section 333(1), (2)(a) b) of the Criminal Code (as amended by Amendment No. 10/2024 Coll., effective from 6 August 2024), which set a limitation period of three years for the above-mentioned criminal offences.

The above provisions mainly concern the basic elements of corruption offences. In the Slovak Republic, the provision or acceptance of a bribe of any amount, or the acceptance or provision of anything for an act that is explicitly defined in the basic elements of corruption offences, is also a criminal offence of corruption. The above provisions apply "only" to the person who gives the bribe, not to the person who accepts it. It is clear from the above that it is not the public official who can be prosecuted for such conduct, but the person who seeks to obtain the public official's action in their favour through bribery. These are provisions that are in the basic facts of the case, so logically they do not involve any corruption of the public officials, which is already dealt with by the qualified facts of the expressed criminal offences. In this context, it can therefore be reliably concluded that the amendment to the criminal codes did not affect the investigation of corruption offences, nor did it affect the investigation of offences affecting public finances and the finances of the European Union.

Section 119(6) of the Criminal Procedure Code (as amended by Amendment No. 416/2025 Coll., effective from 27 December 2025) introduces new rules on the admissibility of testimony from a cooperating person. The basic purpose of this provision is to strengthen the credibility of evidence, in particular by emphasising the requirement for the truthfulness of the testimony of a cooperating person. At the same time, this provision does not affect the overall course of the investigation, which continues to be based on the evaluation of all legally obtained evidence in its mutual context.

The adopted legislation introduced an imperative into the Slovak legal system, which defines the obligation of a cooperating person to tell the truth. The above provision has no impact on the quality of the investigation of the facts of the case, as the testimony of a cooperating person must be verified by other evidence ( ). This result also follows from the consistent case law of the European Court of Human Rights and, at the same time, from the domestic case law of both the Supreme Court of the Slovak Republic and the Constitutional Court of the Slovak Republic. The amendment to the defined provision did not render the testimony of a cooperating person null and void; rather, it expressly required the cooperating person not to lie about their own criminal activity or that of other persons. The European Court of Human Rights also considers isolated evidence without any further verification to be insufficient to establish criminal liability. Such a conclusion has been expressed by the European Court of Human Rights in several cases.

As regards the provision of Section 119(6) of the Criminal Procedure Code, in this case it is imperative for the cooperating person not to lie, but to tell only the truth. The process of evidence gathering is a systematic procedure carried out by law enforcement authorities, during which they evaluate the evidence obtained individually and in its entirety. In 2025, the Office for Combating Organised Crime investigated several significant cases, whether of a corrupt nature or cases with a significant financial impact on funds from the European Union budget. It also concluded investigations into several cases with a proposal to bring charges. In none of the cases involving serious corruption offences did the statute of limitations expire during 2025.

The independence of investigations and investigators in terms of their powers has been preserved in its entirety. It is mainly the prosecutor who is the guarantor of legality in the investigation, and none of his superiors is authorised to instruct the investigator on how to proceed in the criminal case assigned to him, what procedural acts he should carry out and how he should decide on a particular criminal case. The powers of superiors have not been changed by the reform of the criminal law or by the reorganisation of the Police Force.

Application practice has also confirmed that, given the highly latent nature of corruption offences, the most effective tool for obtaining irrefutable, criminally relevant evidence of unlawful corruption is a combination of several criminal procedure institutes regulated in Title Five of Part One of the Code of Criminal Procedure and the willingness of whistleblowers to cooperate with the Police Force.

Results of the activities of the Bureau of the Inspection Service for the second half of the year 2025 (Months VII - XI of 2025).

Criminal Offences of Corruption	**Members of the Police Force**	**Members of the Prison and Court Guard Corps**	**Members of the Financial Administration**	**Civilian Persons**	**Total Months VII.-XI. 2025**
Number of resolutions issued under Section 199 of the Criminal Procedure Code (initiation of prosecution)	3	1	1	2	**7**
Number of procedures under Section 206 of the Criminal Procedure Code (filing of charges)	0	1	1	3	**5**
Number of accused natural persons	0	1	3	10	**14**

In the practice of performing official activities in the Bureau of the Inspection Service, no legal or other impediments to the investigation and prosecution of grand corruption have been identified. The investigator of the Police Force, regardless of his/her position in the organisational structure of any institution, is obliged to act in conformity with the Constitution, constitutional laws and other generally binding legal regulations and international treaties to which the Slovak Republic is bound. Only if it were proven that the conduct is not *lege artis*, every investigator of the Police Force, regardless of his/her rank in the structures of the state bodies, would be held responsible for the illegal conduct and at the same time punished in the procedure prescribed by law according to the nature of the identified unlawful elements.

27. Official data on the number of investigations, prosecutions, final judgments…

Ministry of Justice of the Slovak Republic: In the table below, there are preliminary data on persons convicted of corruption offenses for less than a year in 2025. The complete set of data on convicted persons will be available after March 2026.
- In 2023, a total of 84 persons were convicted of corruption offenses under Sections 328 to 336d of the Criminal Code, in 2024 a total of 67 persons, and in **less than a year of 2025**, 35 persons so far.

Section/Criminal Code	**natural persons**	**legal persons**	**Total**
NTZ - 328	0	0	**0**
NTZ - 329	10	0	**10**
NTZ - 330	0	0	**0**
NTZ - 332	1	0	**1**
NTZ - 333	16	1	**17**
NTZ - 334	0	0	**0**
NTZ - 336	6	1	**7**
NTZ - 336a	0	0	**0**
NTZ - 336b	0	0	**0**
NTZ – 336c	0	0	**0**
NTZ – 336d	0	0	**0**
Total	**33**	**2**	**35**

GPO:
Statistics – see Annex
As can be seen from the above statistical data, in 2025:

- Criminal prosecution for corruption criminal offences was **initiated in a total of 47 cases**, which includes both criminal cases in which prosecutorial supervision is carried out by the OZK, as well as cases where supervision is carried out by regional prosecutors' offices.
- **Charges** were **filed** this year in a **total of 42 criminal cases** (**against 77 persons**).
- A total of **26 indictments were filed** in corruption cases (against 44 persons),
- **Plea agreements** were concluded in **5 cases** (against **6 persons**).
- A total of **38 persons were convicted** of corruption criminal offences in 2025.

When comparing these statistical data with data for previous years, when the investigation was carried out by the NAKA PPZ and the prosecutorial supervision was carried out by the SPO GPO, it is possible to see an absolutely striking drop in practically all statistical indicators. For example, compared to statistical indicators for 2022 (source https://www.genpro.gov.sk/fileadmin/Sprava_o_cinnosti/2022_sprava_o_cinnosti_USP.pdf), in that year, charges were filed in a total of 168 cases, indictments were filed in 83 cases, plea agreements were concluded in 42 cases, and 118 perpetrators were convicted.

The above-mentioned **significant decrease** in the number of criminal matters in 2025 is derived from a significant decrease **in new criminal offences revealed by the police** and is most likely directly related to the fundamental reorganization of the police in 2024, when specialized anti-corruption units were abolished, which were the only ones authorized to detect and investigate corruption criminal matters, whether common, simple, and corruption at the highest level. The investigators and operative officers of NAKA have been systematically prepared in long-term and trained to uncover corruption cases through their own operational activities and have had a relatively good success rate in this regard. After the reorganization of the police, some corruption cases (especially the more serious ones) are revealed and investigated on the basis of selective jurisdiction by the Office of Fight against Organized Crime (in which a smaller part of the investigators of the former NAKA work), but in general, the detection and investigation of corruption was entrusted to the competence of the Regional Directorates of the Police Force ("KRPZ"). However, the investigators and operatives of the Regional Directorates of the Police were not trained or otherwise professionally prepared in the past to **uncover corruption criminal matters** and their professional training began only after the corruption agenda was assigned in their competence. At the same time, the specialization of investigators directly for corruption criminal offences has not yet been established at the individual KRPZs. These circumstances were probably reflected in the rapid decrease in the number of revealed corruption cases by the KRPZ.

The primary task of the prosecutor's office is not to detect new corruption criminal matters, but to supervise their investigation by the police. For this reason**, it is very problematic to expect that the prosecutor's office will improve the above-mentioned low number of newly detected cases**. In this regard, the police must therefore improve and streamline its detection activities in particular. **The prosecutor's office is contributing to improving this situation mainly through training activities in relation to police forces, with several training activities are planned by the prosecutor's office in 2026**, focused on the prosecution of corruption. In 2025, the OZK GPO also carried out several training activities in relation to regional prosecutor's offices, focused on the investigation of corruption criminal cases, and within this framework, OZK prosecutors (as former prosecutors of the Special Prosecutor's Office with many years of experience in corruption criminal cases) are trying to pass on this experience and "know how" to other prosecutors.

Regarding the specialization of prosecutors in corruption crimes, the Prosecutor General of the Slovak Republic issued Instruction No. 17/2025 of 30 December 2025, which established the specialization of prosecutors of regional prosecutors' offices and the Prosecutor General's Office in corruption criminal offences. This instruction formally introduces the specialization of prosecutors who are to deal with corruption criminal offences in individual regional prosecutors' offices and in the Serious Crime Department of the General Prosecutor's Office of the Slovak Republic. The implementation of the aforementioned instruction contributed to greater expertise of prosecutors in supervising corruption criminal matters.

Ministry of Interior/Presidium of the Police Force:

The police force **is intensively investigating** criminal corruption **even after the organisational change in the structure of the police force**. in the period from 1 September 2024 to the end of 2025, the relevant departments of the Police Force obtained **270 pieces of criminal intelligence** related to corruption offences such as bribery, accepting bribes and others, while in comparison with the period of 2022, which the GP SR compares in its opinion, **227** were obtained by NAKA**.**

In 2025, **74 criminal offences were detected** and **41 were solved, with a clearance rate of 55 per cent, which is only 3 per cent lower than in 2022**. The rate of completion of criminal cases is faster than in 2022, at 23 per cent. At the same time, it should also be emphasised that **the number of detected crimes affecting the financial interests of the EU is higher compared to 2022,** with **42 offences** detected causing damage of €71,962,000, compared to 37 offences in 2022 causing damage of 'only' €2,278,000. **The** total **value of assets seized in 2025 was €22,927,197,** compared to only €11,556,219 in 2022, **which is half the amount seized in 2025.** The number **of assistance cases** carried **out for the EPPO in 2025 was 29, while in 2022 there were "only" 5.**

The police force is aware of its obligation to actively seek out and investigate corruption offences. Our specialised UBOK unit and the relevant departments of the criminal police at regional police headquarters are constantly engaged in activities to combat corruption. However, in addition to detecting and investigating corruption offences, they also detect and investigate offences supervised by the EPPO, which are key to protecting the EU's financial interests.

The Police Force can responsibly state that all UBOK operations and thus criminal prosecutions, **with one exception**, were based on the **Police** Force's **own operational activities**, not on information from cooperating persons, reports from citizens or other authorities.

The GPO refers to the appendix, which is a report on the activities of the Special Prosecutor's Office from 2022. On page 20, the report states, among other things*, that "In 2022, the police investigated several large-scale corruption cases, which were uncovered on the basis of the police's own analytical activities. As was the case last year, the number of large-scale corruption cases uncovered and investigated remains relatively small, and these discoveries were largely based on the analytical skills of a few specific investigators, rather than on a functioning system of analysts and operatives, which the anti-corruption unit of the National Criminal Agency sorely lacks. The detection of complex corruption schemes in public procurement, the processing of subsidies from the Slovak Republic and European Union budgets, high-value public contracts and similar serious matters involving enormous waste of public funds will not be possible without a significant increase in the number and quality of analysts, operatives and investigators*.

The above statement by the former Special Prosecutor's Office, on which the General Prosecutor's Office of the Slovak Republic currently relies, implies that in 2022, **corrupt criminal activity was not uncovered by operational police officers, but by procedural authorities, i.e. investigators.** The criminal activity was uncovered on the basis of statements, and new acts of corruption emerged from individual statements. The corruption was therefore not uncovered through operational and investigative activities. We would just like to point out that in such a situation, if the investigator did not deal with the suspicions of corruption arising from the statements in a procedural manner, **the competent prosecutor supervising the investigation file would have to do so. We consider it incorrect to criticise the performance of operational and investigative activities on this basis.**

The GPO's statement that investigators and operatives of the former NAKA were systematically trained over a long period of time to detect and investigate corruption offences **is** therefore **not in line with the relevant report submitted by the former SPO**. In this regard, on behalf of the Police Force, we refer to the specialisation identified in detail above, as well as to the numerous training activities identified in detail in the annex.

Ministry of Justice:

Although the General Prosecutor's Office of the Slovak Republic pointed out that 168 cases of corruption were prosecuted in 2022, the qualitative aspect of the evidence in these cases was not sufficiently taken into account in the interpretation of this data. A significant proportion of these prosecutions were based mainly on the testimony of cooperating defendants, the evidential value of which was, in some cases, partially and, in others, fundamentally questioned or weakened in the course of further criminal proceedings.

From a statistical point of view, 2022 can therefore be seen as a period when there was an increase in the number of criminal prosecutions that were not always supported by comprehensive and multi-source evidence. Conversely, in the later period, including 2025, the increased number of charges was the result of longer-term, systematic, and thorough investigative activities based on a combination of operational and investigative findings, documentary evidence, financial analyses, and other objective means of evidence. Such an approach is inevitably more demanding in terms of time and personnel, but it meets higher standards of quality and sustainability of criminal prosecution.

The decline in recorded statistical data on the number of criminal prosecutions was also contributed to by the legitimate response of law enforcement authorities to the risks associated with the abuse of the institution of cooperating defendants. In this regard, the Slovak Republic has reflected the case law of the European Court of Human Rights[27], which repeatedly emphasizes the need for careful evaluation of the statements of cooperating defendants and the requirement for their sufficient verification by other independent evidence. This development aims to limit situations in which charges could be brought solely or predominantly on the basis of unverified or purposeful statements, thereby strengthening the principles of legality, fair trial, and protection of the fundamental rights of persons involved in criminal proceedings.

Q 28 Potential obstacles identified in law or in practice to the investigation and prosecution of high-level and complex corruption cases

GPO: The 2024 amendment to the Criminal Code and the Criminal Procedure Code complicated the prosecution of serious corruption criminal matters, among other things, by significantly reducing the criminal penalties for corruption and the limits of qualified bodies of crime derived from the amount of the bribe. At the same time, the amendment also significantly shortened the statute of limitations for corruption criminal offences, thereby reducing the likelihood of a successful investigation of complicated corruption cases, where a longer period of time often elapses from the commission of the crime to its detection and qualified indictment of the perpetrator, which is related to the complexity of such an investigation, where it is necessary, among other things, to perform complex analyses and expert evidence, etc. Due to a significant reduction in criminal penalties and statutes of limitations, several major corruption cases became time-barred in 2024, including a case of serious bribery of foreign public officials and a case of bribery of judges by the former Minister of Economy. Specific problematic provisions:

- Section 87, Subsection 1, letter b) of the Criminal Code (as amended by Amendment No. 40/2024 Coll. effective from 06.08.2024) – with the wording of the legal norm cit. "the upper limit of the penalty exceeding ten years" is the maximum limitation period of 10 years for

[27] [27] *Adamčo v. Slovakia (No. 45084/14) , Vasaráb and Paulus v. Slovakia (Nos. 28081/19 and 29664/19), Erik Adamčo v. Slovakia (No. 19990/20), Mucha v. Slovakia (No. 63703/19)*

all serious corruption criminal offences. This is a setting that cannot be considered appropriate in relation to high-level corruption. This form of corruption is typically latent, committed in most cases in a secret manner without witnesses and is extremely difficult to prove, while its detection often occurs with a significant time lag. The above-mentioned setting of limitation periods may in practice limit the time frame for effective criminal prosecution of these acts.

- Section 87, Subsection 1, letter d) of the Criminal Code in connection with bribery pursuant to Section 332, Subsection 1, 2 of the Criminal Code and Section 333, Subsection 1, 2, letters a), b) of the Criminal Code (as amended by Amendment No. 40/2024 Coll. effective from 06.08.2024) - with the wording of the legal norm cit. "the upper limit of the penalty exceeding three years" is the limitation period of 3 years for all the above-mentioned criminal offences of bribery. This is a setting that cannot be considered adequate in relation to corruption at any level. This form of corruption is also often typically latent, committed in most cases in a secret manner without witnesses and extremely difficult to prove, while its detection often occurs with a significant time lag. The aforementioned setting of limitation periods can thus in practice limit the time space for effective criminal prosecution of these acts.

As a potential obstacle identified in the legal regulations, it is also possible, based on suggestions from regional prosecutors' offices, but also on the activities of the OZK GPO, to identify the new provision of Section 119, Subsection 6 of the Criminal Procedure Code (as amended by Amendment No. 416/2025 Coll., effective from 27 December 2025), which may significantly weaken the effectiveness of high-level corruption investigations, because it disproportionately expands the range of inadmissible evidence and places unusually high demands on the admissibility of the testimony of a cooperating person. The fact that the above provision may be problematic is indicated, among other things, by the fact that a judge of the Specialized Criminal Court in a specific serious corruption criminal case, pursuant to Section 283, Subsection 5 of the Criminal Procedure Code, adjourned the main hearing on 5 January 2026 and filed a motion to initiate proceedings based on Article 125, par. 1 of the Constitution of the Slovak Republic on the compliance of the law with the Constitution. In the opinion of the court, the wording of the newly introduced provision may significantly influence the court's procedure in a specific criminal case, as it can fundamentally and decisively influence not only the taking of evidence in terms of its scope, but above all, also interfere with the rules and principles of evaluating evidence already taken. By the newly introduced provision of Section 119, Subsection 6 of the Criminal Procedure Code, the legislator, in the opinion of the court, created a new rule not only for the execution, but also for the subsequent evaluation of evidence, and this appears to the court as a disharmonious element in the existing legal order in the conditions of the Slovak Republic. Since the court believes that this could have created a legal inconsistency with a generally binding legal regulation of higher legal force (the Constitution of the Slovak Republic), the court-initiated proceedings at the Constitutional Court of the Slovak Republic under Art. 125 of the Constitution.

On 14 January 2026, the Constitutional Court of the Slovak Republic received a Motion from the Prosecutor General of the Slovak Republic to initiate proceedings on the compliance of legal regulations and to suspend the effectiveness of the contested legal regulation pursuant to Article 125, paragraph 1, letter a) and paragraph 2 of the Constitution of the Slovak Republic. The contested legal regulation is: Section 119, Subsection 6 of Act No. 301/2005 Coll. of the Criminal Procedure Code as amended by Act No. 416/2025 Coll.

Ministry of Justice:

With regard to the information presented by the General Prosecutor's Office of the Slovak Republic, we would like to point out that this information may not accurately reflect the objective reality. We would like to draw attention to the fact that the actions of the General Prosecutor and the facts he has presented show signs of bias against the current governing coalition. Evidence for this claim is the conflict between Prosecutor General Maroš Žilinka and Žilina Regional Prosecutor Tomáš Balogh, which was also presented in the media and which shows that the Prosecutor General was personally involved in actions detrimental to representatives of the Slovak government.[28]

Although penalties for corruption offenses have historically been set very strictly in the Slovak legal system, often even exceeding the level of penalties imposed for certain violent crimes, the practice of application in Central Europe has long been moving towards individualization and a preference for alternative forms of punishment. This trend is evident not only in the Slovak Republic, but also in the Czech Republic and Austria, where decisions on punishment emphasize the specific circumstances of the case, the person of the offender, and the purpose of the punishment in accordance with the principles of proportionality and subsidiarity of criminal repression.

The current practice of courts, not only in the Slovak Republic, thus reflects a modern criminological approach that prioritizes effectiveness, prevention, and proportionality of punishment over the automatic imposition of prison sentences, while maintaining sufficient repressive potential in relation to serious forms of corrupt criminal activity.

Key findings from the case study summary on specific parts of the criminal codes (Slovak Republic, Czech Republic, Austria, Germany)

- In several case studies, the Slovak Republic punishes corruption more severely than selected EU Member States
- Although Slovak criminal penalties have historically been set very strictly (often above the level of violent crimes), the practice of application throughout the region (Slovakia, Czech Republic, Austria) is moving towards individualization and the use of alternative penalties. Unconditional imprisonment is more of a rarity than the rule in cases of corruption in Central Europe.
- Judicial authorities (not only in Slovakia) prefer alternative punishments and fines, which reflects a modern criminological approach.
- A specific feature of Germany is the private sector, where criminal prosecution is often not carried out by public authorities, but on the basis of a proposal (initiative).

Following the adoption of legislative changes in the area of criminal law in 2024, it can be said that Slovak criminal law provides for similar and, in some respects, even stricter criminal sanctions and similar limitation periods as the legal systems of neighbouring European Union member states. Importantly, the new legislation is also broadly in line

[28] https://spravy.pravda.sk/domace/clanok/776593-rada-prokuratorov-odporuca-odvolat-balogha-krajsky-sef-podla-nej-preniesol-spor-na-politicku-podu/
https://www.aktuality.sk/clanok/DJUwp8W/kauzy-ludi-blizkych-robertovi-ficovi-eskaluju-spor-maros-zilinka-vs-zilinsky-prokurator/
https://iden.sk/ovplyvnoval-generalny-prokurator-krajskeho-prokuratora-na-branno-bezpecnostny-vybor-dorazil-list-proti-zilinkovi/

with the requirements of the latest European directive on combating corruption[29]..

As regards amendment to the Section 119(6) Criminal Procedure Code please see information on the page 96.

Q 29 Information on effectiveness of criminal and non-criminal measures and of sanctions…

GPO: In 2023 and 2024, the effectiveness of the seizure of assets from criminal activities decreased, mainly due to the amendment of the Criminal Code and also based on the decision of the Constitutional Court of the Slovak Republic, which declared the unconstitutionality of some provisions of the Act on the Seizure of Assets. Based on the aforementioned amendments, prosecutors of the Special Prosecutor's Office and subsequently OZK had to decide in several cases to cancel the seizure of assets of some accused. However, it should be noted that in several specific cases, the assets of the accused remained seized, especially those that directly originated from the criminal activity.

III. Media Pluralism and Media Freedom

A. Media authorities and bodies

Q 30 Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies.

Ministry of Culture of the Slovak Republic: The independent status of the regulator - the Council for Media Services (hereinafter referred to as the "CMS") results from Act No. 264/2022 Coll. on media services hereinafter referred to as the "MSA").

In connection with the issue of adequately securing the regulator's resources, we state that already in 2024, the regulator's expenditure budget was higher compared to the budget from previous years due to the amendments made to the Media Services Act effective from 24 July 2024, which implemented the European Digital Services Act (DSA) into Slovak law and established the Digital Services Coordinator (DSC). In the personnel area, the amendment in question resulted in an increase in the number of employees in the year 2024, and the increase in the regulator's budget. In the year 2025, associated with new competencies and the need to increase the number of employees, this trend continued.

The increase in the regulator's budget, especially regarding the payroll, was predicted in the impact clause in the amendment to the MSA, that took effect on 1 November 2025. This changes in the MSA implemented Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act) (hereinafter referred to as the "EMFA") into the legal order of the Slovak Republic. Since the new competences resulting from the amendment to the MSA represented an additional burden on the regulator's employees, additional increase in required resources was predicted and consequently provided. CMS should therefore have sufficient financial, human and technical resources to perform the entrusted competences.

[29] 2023/0135 (COD), Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on combating corruption, replacing Council Framework Decision 2003/568/JHA and the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union and amending Directive (EU) 2017/1371 of the European Parliament and of the Council

The amendments to the MSA effective from 1 November 2025, which implemented the EMFA into the legal order of the Slovak Republic, expanded the competences of the regulator. Cooperation between central state administration bodies and other public administration bodies has also been extended to the area of issuing periodical publications and operating online news portals. In performing its tasks under the EMFA, the regulator is entitled to request cooperation, including in the form of providing information and data, from central state administration bodies and other public administration bodies. At the same time, a new provision (§ 133h) was added to the MSA, according to which, when exercising supervision, the regulator may require broadcasters, providers of on-demand audiovisual media services, providers of audience measurement systems or other persons who may be presumed to have the required information or data for purposes related to their commercial, business or professional activities to provide, free of charge and within a period specified by the regulator. This refers especially to the information or data that are appropriate and necessary for the performance of the regulator's tasks under Chapter III of EMFA.

Q 31 Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies

There were no changes in this area compared to the previous reporting period.

A parliamentary bill amending Act No. 264/2022 Coll. on Media Services was submitted to the December 2025 session of the National Council of the Slovak Republic by a group of MPS.

Ministry of Culture did not propose of submit the aforementioned bill, nor has it yet been asked to take an official position within the regular legislative process.

National Council of the Slovak Republic has not yet discussed the parliamentary bill in question.

The bill can be accessed on:
http://www.nrsr.sk/web/Default.aspx?sid=zakony/cpt&ZakZborID=13&CisObdobia=9&ID=1110

Q 32 Existence and functions of media councils or other self-regulatory bodies

The applicable legal regulation within the framework of the MSA assumes the existence of a self-regulatory mechanism that regulates the editorial standards of content service providers and has its own Code. A code, in this regard, is a system of rules that regulates the editorial standards of content service providers or ensures assistance in exercising the right to effective judicial protection in connection with the obligation to maintain confidentiality about the source of information or in exercising the right or protection under Section 17, paragraphs 4 and 5 of the MSA or under special regulations. The regulator has also the competences to enter codes and self-regulatory bodies into the register of self-regulatory mechanisms and self-regulatory bodies. This relates also to the provision on audience measurement systems.

The MSA defines specific criteria that must be met by a code that regulates the provision of assistance in exercising the right to effective judicial protection in connection with the obligation to maintain confidentiality about the source of information, so that such a code can be registered by the regulator (it is applied by several content service providers for at least one year under the control of a self-regulatory body that is an association of legal entities or a non-governmental non-profit organization, has an established mechanism for regular and transparent monitoring of its use and independent evaluation of the results of its application, which are publicly accessible, and the self-regulatory body demonstrates compliance with these conditions in the application). In accordance with the amendment to the MSA effective from 1 November 2025, a mandatory part of the yearly report is part on the activities of the self-regulatory body for the relevant calendar year, which the self-regulatory body submits to the regulator, in addition to information on the number and method of handling received complaints. This should contain also information on the number and method of handling received requests for assistance in exercising the right to effective judicial protection in connection with the obligation to maintain confidentiality about the source of information or with the exercise of the right or protection under Section 17, paragraphs 4 and 5 of the MSA or under a separate regulation. Such information is also to be published on the website of the self-regulatory body. At the same time, the co-regulatory mechanism is also extended to the area of providing viewership measurement systems.

Proceedings before the self-regulatory body, in addition to the area of providing content services, also apply to the area of providing viewership measurement systems. The list of self-regulatory bodies and codes is maintained by the RPMS. The Advertising Council has been listed by the regulator since 2023 (Optional Protocol to the Code of Ethics for Advertising Practice on Advertising Practice in the Dissemination of Media Commercial Communication), and in 2025 the Association for the Protection of Journalistic Ethics was also listed (Optional Protocol to the Code of Ethics for Journalists on the Protection of Human Dignity, Humanity and Minors and the Second Optional Protocol to the Code of Ethics for Journalists on Public Access to Information, Diversity of Information, Plurality of Opinion, Objectivity and Impartiality).

The Advertising Council is an association for ethical self-regulation of advertising, founded in March 1995 by entities active in the marketing communication market. It brings together more than 30 entities and includes advertisers from various segments (telco, finance, retail, alcohol, food, etc.), advertising agencies, industry associations and their members, and last but not least, media and broadcasters. All members of the RPR have committed to adhering to the Code of Ethics for Advertising Practice and strengthening the reputation of advertising. The Advertising Council has a right to review any published advertisement compliance with ethical standards, as long as the commercial communication is intended for national market.

In order to assess the compliance of advertisements with the Code, the RPR has established an independent collective body, the Arbitration Commission, whose members are experts in the field of marketing communication, law, psychology, sociology, or the financial sector, and are capable of assessing complaints and advertisements independently and with required expertise. The Arbitration Commission assesses complaints about violations of the Code by advertising from the public, natural and legal persons, associations, or state authorities. After assessing the complaint, it adopts a decision and issues an arbitration award. If the Commission finds a violation of the Code and issues a positive arbitration award (rules on violation), the initiator or distributor of the advertisement is notified of this fact and invited to withdraw or modify the advertisement. Since 1995, RPR has been a member of EASA – The European Advertising Standards Alliance – an alliance of self-regulatory bodies in the field of advertising. Within the industry there is a high level of compliance with the rulings of the Arbitration Commission.

The Association for the Protection of Journalistic Ethics in the Slovak Republic (AONE) was established in 2001 on the initiative of the Slovak Syndicate of Journalists and the Association of Printed and Digital Media. In 2017, the Interactive Advertising Bureau Slovakia (IAB Slovakia), which brings together digital media, joined AONE, and subsequently the Press Council of the Slovak Republic was transformed into the Press and Digital Council of the Slovak Republic (TR SR). In 2024, the Optional Protocol to the Code of Ethics of Journalists on the Protection of Human Dignity, Humanity and Minors was adopted. Consequently, the Association of Television Broadcasters of Slovakia and the Association of Radio Stations of Slovakia also became members of AONE. In 2025, AONE adopted the Second Optional Protocol to the Code of Ethics of Journalists on Public Access to Information, Universality of Information, Plurality of Opinion, Objectivity and Impartiality.

The decision-making body of the Association for the Protection of Journalistic Ethics is the Press and Digital Council of the Slovak Republic. Members may include prominent figures in public, cultural and social life who do not work as active journalists or publishers and do not represent any political party. The number of members of the TR SR is 11, they elect a chairman and two vice-chairmen. Members are elected by the general assembly of AONE. When assessing complaints about violations of journalistic ethics, the TR SR is guided by the Code of Ethics for Journalists. The Press and Digital Council is a member of the Alliance of Independent Press Councils of Europe – AIPCE.

Both associations publish their decisions on their websites and report relevant cases to the CMS.

Further information about the activities of self-regulatory bodies can also be found at:
https://rpr.sk/sk/
https://www.aonesr.sk/ .

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

Q 33 Measures taken to ensure the fair and transparent allocation of state advertising

In order to ensure the highest possible level of transparency in the financing of state advertising, the amendment to the MSA, effective from 1 November 2025 introduced, in addition to the obligation of the recipient of public funds provided for state advertising to publish the required information, an additional notification obligation for the sponsor of state advertising. The sponsor of state advertising is obliged to notify the regulator of the provision of public funds for state advertising for the period of the previous calendar year by 31 January, and within the framework of that notification, it is obliged to provide the regulator with information in the legally specified extent. This obligation also allows the regulator (CMS) to monitor the allocation of expenditure on state advertising annually, as follows from Art. 25(3) of the EMFA. The information on the provision of public funds for state advertising also forms part of the regulator's annual report, which is publicly available.

In order to ensure the implementation of Art. 25(3) 1 and 2 of the EMFA, and thus to prevent the risk of hidden subsidies and undue political influence on the media, requirements for transparency, objectivity, proportionality and non-discrimination were established in the allocation of public funds or other state resources for state advertising or the purchase of other goods or services that are not state advertising. The criteria and procedures used for the allocation of public funds for state advertising and contracts for the supply of goods or the provision of services must be made publicly available in advance by electronic and user-friendly means. The procedure used must be open, proportionate and non-discriminatory.

New legal provisions also set out common requirements for the publication of information on recipients of state advertising expenditure and on the amounts spent, and an obligation to ensure that the necessary information regarding state advertising is made available to the public in electronic format and is easily viewable. State advertising providers are obliged to ensure that the state advertising expenditure they spend in the relevant calendar year is distributed to a wide range of content service providers represented in the relevant media market.

The MSA also explicitly regulates the obligations of state advertising providers when placing state advertising orders and also the obligations of public administration entities when placing orders for other services or goods originating from a content service provider or an online platform provider that are not state advertising. This relates to the situations if the public administration entity provides public funds, other remuneration or an advantage directly or indirectly to the content service provider or the online platform provider for the performance.

In Act No. 265/2022 Coll. on publishers of publications and on the register in the field of media and audiovisual and on amendments and supplements to certain acts (Publications Act), the amendment effective from 1 November 2025 introduced the obligation of the publisher of a periodical publication (with the exception of the publisher of a scientific periodical publication) and the obligation of the operator of a news web portal to publish on its website information that it has been provided with funds for state advertising, whether from public funds or from public authorities or public entities from another Member State or from a state that is not a Member State of the European Union. Obliged entities are obliged to publish on their website information about the total amount of funds that have been provided to them for state advertising for the calendar year, by 31 January of the following year.

Q 34 Safeguards against state / political interference, in particular:
- safeguards to ensure editorial independence of media (private and public)

In 2025, there were no legislative changes that would affect the general editorial independence of the media.

- ***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***

In 2025, there was no change to Act No. 157/2024 Coll. on Slovak Television and Radio and on Amendments to Certain Acts, that would affect rules governing the creation of public service broadcaster bodies.

The amendment to the Public Service Broadcasting Act, effective from 1 November 2025, entrusted the competence to monitor and analyze compliance with the guarantees of the independent functioning of the public service broadcaster to the CMS.

- 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

The rules and procedures that enable the assessment of concentrations in the media market and that could have a significant impact on the plurality of information are stated in Part Twelve of the MSA.

The amendment to the Media Act, effective from 1 November 2025, has expanded the circle of entities whose impact on the plurality of information in the media market is assessed by the regulator to include online platform providers. The Media Act explicitly stipulates that when assessing the impact on the plurality of information in the media market and when assessing the risks of disruption of the plurality of information, the regulator is obliged to take into account the facts set out in No. 22, paragraph 2 of the EMFA. The aforementioned facts are also to be taken into account when drafting a generally binding regulation issued by the regulator, which regulates the details of the assessment of the impact on the plurality of information in the media market and the details of the assessment of the risks of disruption of the plurality of information.

Q 35 Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

No major legislative changes were adopted in the aforementioned area in the reporting period. The amendment to the MSA effective from 1 November 2025 extended the regulator's competence to assess the property connection and personnel connection of a content service provider to the online platform provider in order to examine whether the transparency of ownership relationships or the transparency or credibility of financial resources intended to finance the provision of a content service or online platform, service is ensured.

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

Relevant topics to be covered in your contribution include:
Q 36 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.

In the previous monitoring period, the national Platform for the Promotion of Press Freedom and the Protection of Journalists temporarily did not carry out its activities due to personnel reasons that resulted not being able to reach a quorum and therefore limited its functionality. In 2025, an agreement was reached with the members of the Platform to continue its activities and supplement the missing nominations. In 2025, the missing members of the national Platform were added. Currently, the Platform is working on a new work plan as well as a website that will make available basic documents for the protection of journalists, journalistic standards and activities within the framework of the Council of Europe's campaign to protect journalists.

The Slovak Republic regularly sends statements within the set deadlines in relation to notifications published on the online Platform for the Promotion of the Protection and Safety of Journalists operated by the Council of Europe.

Other mechanisms reported in previous monitoring periods remain unchanged.

The high standard of source protection continues to be maintained. The Slovak Republic has an effective protection of sources that has been proven to work for almost twenty years now. The current updated system fulfills all the requirements set out by EMFA. For a proper understanding it needs to be viewed in context of the § 6 of the Act No. 265/2022 Coll. on publishers of publications and its interaction, namely, with the Criminal Code and Code of Criminal procedure. Among other safeguards, the derogation from this right set out in § 6 (6) of the Act on publishers of publications sets out proportionality test that can be triggered only in interplay with the Criminal Code under very strict, specific and limited circumstances; at the end of which only the independent court can carry out this test and rule that conditions have been met. This is further safeguarded by the procedural tools at the disposal of the journalist including objection and the right to appeal. The elements of the national proportionality test conditions for derogation are at the minimum on the level of EMFA.

Also, other mechanisms, such as contact points established by the police force and independent monitoring systems, reported in previous monitoring periods remain unchanged.

Q 37 Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

In 2025, a draft methodology for the Police procedure was developed for the purpose of protecting journalists at risky mass events; in accordance with the fulfillment of task 4.4.2 of the Strategy for the Prevention of Crime and Other Antisocial Activities in the Slovak Republic until 2028. The document in question is to be presented to the Platform for the Support of Freedom of the Press and the Protection of Journalists. Decision on its adoption by the competent authority is expected to take place during 2026.

At the same time, in 2025, the Slovak Police Force developed the Principles of Sensitive Media Reporting on Cases of Violent Extremism. The document has the character of a recommendation and is intended to contribute to ethical reporting and the safety of journalists in the event of and reporting on terrorist attacks. The material in question is to be presented to the Platform for the Promotion of Press Freedom and the Protection of Journalists. Decision on its adoption by the competent authority is expected to take place during 2026.

In connection with the resumption of the national Platform for the Promotion of Press Freedom and the Protection of Journalists activities in 2026, a functional mechanism for monitoring attacks on journalists and crimes against journalists should be drafted and submitted to the Slovak Government Council for Crime Prevention.

The decision of the Slovak Government taken in September 2025 set out the task of drafting the Implementation plan for mapping, developing and setting up a system for monitoring and evaluating the implementation of existing recommendations to increase the safety of journalists and other media workers in the EU by the end of May 2026.

Other mechanisms reported in previous monitoring periods remain unchanged.

Q 38 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)

While the Act on Free Access to Information is the responsibility of the Ministry of Justice of the Slovak Republic, the Act No. 265/2022 Coll. on Publishers of Publications sets out additional obligation in § 7 stating that: "Public authorities, budgetary organizations and contributory organizations established by them and legal entities established by law are obliged, on the basis of equality, to provide the publisher of a periodical publication, the operator of a news web portal and the press agency with information about their activities in order to inform the public truthfully, timely and comprehensively; the provisions of special regulations are not affected by this."

Ministry of Justice: The Constitutional Court in its ruling PL.ÚS 6/2025 repealed the provisions on charging fees for requests for information in cases of exceptionally extensive searches for information (Section 14 para 6 and 7), they are not more effective; otherwise, the amendment remains valid and effective.

Q 39 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

Ministry of Culture of the Slovak Republic: In cooperation with the National Contact Point for SLAPP, an agreement was reached with the Platform for the Promotion of Press Freedom and the Protection of Journalists on the need to create a registration monitoring system for SLAPPs and a series of training courses. The topic of SLAPPs will be the subject of discussions by the Platform in the first quarter of 2026. The planned training courses should be implemented both for subjects who could become victims of SLAPPs and for subjects who would be in charge of their implementation. In this regard, cooperation will be necessary, in particular, with the Judicial Academy regarding the training of judges and the Bar Association regarding the training of lawyers. The provision of assistance for training has also been provisionally promised by the Council of Europe.

The decision of the Slovak government of September 2025 set the task of developing a Strategic plan for the implementation of the Council of Europe recommendation on SLAPP lawsuits, which seek to prevent the participation of the public, especially journalists, in informing about matters of public interest, by the end of May 2026.

Ministry of Justice: The draft law on the transposition of the anti SLAPP directive was submitted to the public consultations in November 2025. At the moment, submitted comments are being assessed and evaluated. The draft is expected to be submitted to the government for the approval in the first quarter of 2026.
No. of process LP/2025/667
The draft law proposes the specific disputes involving the protection of the weaker party and from the systematic point of view disputes are added to the third title of the Civil Procedure Code (Special Procedural Procedures) of the second title (Disputes Involving the Protection of the Weaker Party) as the fourth part entitled Disputes Against Public Participation.
The means of protection consist of:

- introducing a mechanism that will enable the court to determine at an early stage whether the lawsuit is intended to intimidate and discourage public participation and to quickly dismiss or suspend such a lawsuit,
- the burden of proof will be on the plaintiff, who must demonstrate that their action is in good faith with the aim of exercising their rights and not to discourage and sanction a person involved in public participation in matters of public interest,
- the weaker party will be able to ask the court to order the deposit of security for damages or other harm and an advance payment for the costs of the proceedings,
- the court will be able to impose effective, proportionate, and dissuasive sanctions on the plaintiff for abusive procedural actions, such as the obligation to publish the court's judgment, to pay the full amount of legal representation costs incurred, or to impose an adequate fine.

GPO: **In the reporting period of the calendar year 2025 the following criminal proceedings are being or were conducted in the Slovak Republic, in which journalists or the media act as their participants, either in the procedural position of the accused or the injured party:**

1. Jurisdiction of the Regional Prosecutor's Office Bratislava

- Criminal matter originally conducted at the Regional Prosecutor's Office Bratislava under ref.no. 1 Kv 56/25/1100 for the offence of dangerous threats under Section 360, Subsection 1 of the Criminal Code (injured journalist of the News portal)
- On the factual basis that (simplified) an unknown perpetrator called the injured journalist with the question, if it's normal, that she has got for the answering of his via email sent questions, such a short time, the journalist answered, that it is normal, as a result of which the perpetrator said to the journalist, that she knows where he lives and to his question, if it is a threat, she answered yes.

- The said criminal matter was legally referred to other authority for hearing of the misdemeanour with the resolution of the police officer of 28 July 2025, final on 13 August 2025,

- The criminal matter conducted at the District Prosecutor's Office Bratislava II under ref.no. 3 Pv 310/22/1102 **against the accused** for the offence Illegal Use of Personal Data pursuant to Section 374 Subsection 1 letter a), Subsection 2 letter b) of the Criminal Procedure Code (injured journalist)

- On a factual basis consisting (simplified) in the fact, that the accused published on 24 March 2022 at 18:30 from an unknown location on the social network Telegram on his public user account, with 46 700 followers, a part of the resolution of the

District Prosecutor’s Office Kežmarok, containing non-anonymized personal data of the injured journalist – first name and surname, date of birth and permanent residence, to which publishing she gave no consent, whereby he found out about these in connection with the from the injured party applied constitutional law for the judicial protection within the civil litigation, while he anonymized the names of the accused parties and only the personal data of the injured were clear readable and the text under the anonymized data of the accused, he added a signature to it

- “Who are the public and less public names of the members of Octopus, which is responsible for the indoctrination of your kids?”
- The police officer submitted in the said criminal matter on 10 October 2025 motion to file an indictment, about which to the moment of providing a supporting document from the supervising prosecutor no substantive decision has been made due to the application of the extraordinary remedy pursuant to Section 363 Subsection 1 and et seq. of Criminal Procedure Code, about which to the moment of the providing of the supporting document no definitive decision was made

- Criminal matter conducted at the District Prosecutor’s Office Bratislava IC under the ref.no. 2 Pv 188/25/1104 for the offence Violation of Copyright pursuant to Section 283 Subsection 1, Subsection 2 letter a) of the Criminal Code (injured television station)

  - On a factual basis consisting (simplified) in the fact, that an unknown perpetrator published in the time period from 25 August 2024 at least to 15 May 2025 from an unknown location on the service YouTube on his Profile at least 217 videos with the content of 217 various with copyright protected audio-visual works, to which they have copyrights and which are ownership of two injured companies, one of which were caused damages of 164,101,- euros and the second one in the amount of 26,400,- euros, based on non-purchase of license to these works and to their further public distribution

- The said criminal matter wasn’t to the moment of providing the supporting documents in the pre-litigation stage of the criminal proceeding effectively completed, it is current necessary for the determining of the further process to wait for the delivery of the outcomes of the legal assistance from the USA.

- Criminal case originally conducted at the District Prosecutor’s Office Bratislava IV under the ref.no. 2 Pv 307/24/1104 **against the accused** for the offence Dangerous Threats pursuant to Section 360a Subsection 1 letter c), Subsection 2 letter b) of the Criminal Code with the reference to Section 138 letter b) of the Criminal Code (injured television presenter)

- On a factual basis (simplified), that the accused contacted the injured party in the time period from 05 December 2022 until 12.00 on 03 November 2024 in Bratislava city borough Dúbravka and other locations via letters, electronic telecommunications network Instagram, Facebook and from his email address, he saw her as tv presenter on the screen, he fall in love with her, searched information about her, he wrote her messages from various accounts to her work email, Profiles on social network Instagram and Facebook, content of which was his attempt to establish a close contact with the injured party, whereby the behaviour of the accused harassed her, she asked him repeatedly to stop his actions, she blocked him repeatedly on her social networks, but the accused carried on in the harassment of the injured, it culminated in the visit of the injured on the place of her residence, which he found out via Land Registry Portal, where he personally arrived on 03 November at 12.00 and knocked on her door and after the injured opened her door and asked him with raised voice to stop harassing her or she will call the police, because she was afraid of his long lasting actions, she felt uncomfortable on her journey to the work and from work, as a result of which her employer provided her with security, the accused has left

- With a criminal order of the City Court Bratislava I ref.no. 0T 729/2024 of 10 November 2024, legally valid on the same day, the accused was found guilty, and was sentenced to a prison sentence of 12 months with a conditional suspension of the execution of the sentence for a probationary period of 4 years and a imposition of restrictions and obligations

Updated information for 2024

- Criminal case conducted at District Prosecutor's Office Bratislava I under ref.no. 4 Pv 143/24/1101 against the accused for the offence of Dangerous Threats pursuant to Section 360 Subsection 1 of the Criminal Code (injured editor of the TV station)
- On a factual basis (simplified), that the accused has sent via the social network Instagram to the injured journalist messages, in which he vulgarly insulted him and threatened him with grievous bodily harm
- Indictment was filed against the accused to City Court Bratislava I on 17 January 2025 and the said criminal matter wasn't to the moment of providing of the supporting documents in the trial stage of the criminal proceeding effectively completed.

- Criminal case conducted at District Prosecutor's Office Bratislava I under ref.no. 4 Pv 243/23/1101 against the accused for the offence of Sexual Violence pursuant to Section 200 Subsection 1 of the Criminal Code (injured – investigative reporter of a news portal)

- on a factual basis (simplified), that the accused, as a masseur, sexually harassed the injured journalist against her will during the performance of a pre-ordered classic full-body massage.

- Indictment was filed against the accused to City Court Bratislava I on 23 May 2025 and the said criminal matter wasn't to the moment of providing of the supporting documents in the trial stage of the criminal proceeding effectively completed.

- Criminal case conducted at the District Prosecutor's Office Bratislava I under ref.no. 4 Pv 102/20/1101 against the accused for the offence of Embezzlement pursuant to Section 213, Subsection 1, Subsection 2 letter a) of the Criminal Code (accused journalist – investigative Blogger)
- On a factual basis that (simplified) the accused journalist had unlawfully appropriated (embezzled) money in the amount of 4,000 euros, belonging to a civic association, in which he served as executive director and statutory body.

- A settlement between the accused and the injured party was reached and the criminal prosecution of the accused was discontinued with a resolution of the City Court Bratislava I ref. no. 32 T 26/2023 of 29 July 2025, legally valid on 29 July 2025
- Criminal case conducted at the District Prosecutor's Office Bratislava II under ref.no. 4 Pv 200/23/1102 against the accused for the offence of Slander pursuant to Section 373 Subsection 1, Subsection 2 c) of the Criminal Code (injured journalist)
- On the factual basis that (simplified) the accused acting under various nicknames in the time period from 21 November 2021 to 25 July 2023 published a video and a series of posts on the internet, in which he repeatedly insulted the journalist with the statements, that she is "infertile", "whore", "she had 3 abortions" etc., he said about her husband that he is "homosexual and pretends to be a heterosexual, but he is not", further that she is "homewrecker" and that she has sexual intercourse with other person, in that way did she secure her career advancement, she is Sex-social climber" and "intercourse was her main business tool…", as a result of this she is now infertile, but all these from accused presented facts about the injured journalist with defamatory nature were untrue, which the accused knew, and after the publishing of these untrue facts these were seen by thousands of users.
- Indictment was filed against the accused to City Court Bratislava I on 08 December 2025 and the said criminal matter wasn't to the moment of providing of the supporting documents in the trial stage of the criminal proceeding effectively completed.

- Criminal case conducted at the District Prosecutor's Office Bratislava III under ref.no. 2 Pv 111/24/1103 in the matter of the offence of Slander pursuant to Section 373 Subsection 1, Subsection 2 c) of the Criminal Code (injured journalist)
- On a factual basis (simplified), that an unknow perpetrator in September 2023 at an unspecified location and in unspecified manner made an audio-visual recording (so-called deepfake), which was supposed to capture a private conversation between the injured journalist and the chairman of a political party, while the topic of their conversation was supposed to be the manipulation of the parliamentary elections in the Slovak Republic by them. The perpetrator then placed this recording on the internet, where it was further spread via social networks, with users of these networks commenting on and sharing the recording, which was supposed to have resulted in a deterioration of the public image of the injured journalist.
- The criminal prosecution was discontinued with the resolution of police officer of 08 September 2025, legally valid on 25 November 2025 in connection with the resolution of the supervising prosecutor, with which was the complaint of the injured journalist against the decision of the Court of first instance rejected.

2. Jurisdiction of the Regional Prosecutor's Office Trnava

- Criminal matter was originally conducted at the District Prosecutor's Office Trnava under ref.no. 1 Pn 461/25/2207 **in the matter** of suspicion of offence Dangerous threats under Section 360, Subsection 1 of the Criminal Code (injured journalist of the TV channel)

- On the factual basis that (simplified) an unknown perpetrator sent from his Instagram profile the injured editor to her Instagram profile several comments which contained various insulting statements and threats, that he "hopes, that somebody shoots her in the future, break her legs" etc.

- The said criminal matter was with the resolution of the police officer of 13 August 2025, legally valid on 23 August 2025, pursuant to Section 197 Subsection 1 letter a) of Criminal Code transferred to different authority for the hearing of the offence.

Updated information for 2024

- Criminal matter was originally conducted at the District Prosecutor's Office Trnava under ref.no. 2 Pv 490/24/2207 against the **accused** of the offence Disorderly Conduct pursuant to Section 364 Subsection 1 letter a) of Criminal Code (injured television presenter)

- on the factual basis that (simplified) the accused together in the presence of at least 3 persons on 30 October 2024 about 10:40am in the city Trnava in the public place physically assaulted the injured journalist, who was at this time recording a report here, in that way, that he has hit her at least one time with the open palm of his left hand in her face, by which he caused her fracture of nasal bones, sprain of the cervical spine, concussion and nasal contusion
- the accused was found guilty by a criminal order of the District Court Trnava under the ref.no. 35 T 15/2015 of 28 April 2025, legally valid at the same day for the offence of bodily harm pursuant to Section 156 Section 1 of Criminal Code in joinder with the offence Disorderly Conduct pursuant to Section 364 Subsection 1 letter a) of Criminal Code, he was sentenced to prison sentence of 16 months with a conditional suspension of the execution for a probationary period of 36 months with simultaneous imposition of a specific restriction and obligations, as well as obligation to pay compensation to the injured from the title damages for pain and suffering

- Criminal matter conducted at the District Prosecutor's Office Galanta under ref.no. 3 Pv 382/24/2202 against the accused for the offence of extortion under Section 189 Subsection 1 of the Criminal Code (injured director of internet news portal)

- on the factual basis that (simplified) the accused person allegedly called the injured director of the web portal from his mobile phone on 26 November 2024 at 08:37am, from whom he allegedly requested the withdrawal of the article published on their portal, and if he did not do so, he would take 30 litres of gasoline and come to the editorial office to set them all on fire, which did not happen.
- the accused was found guilty by a criminal order of the District Prosecutor's Office Galanta ref. no. 1 T 10/2025 of 10 February 2025, legally valid on 25 February 2025 and sentenced with prison sentence of 2 years with a conditional suspension of the execution for a probationary period of 2 years with probation supervision, with simultaneous imposition of a specific obligation, as well as sentence of Forfeiture of property used for this crime (mobile phone)

3. Jurisdiction of the Regional Prosecutor's Office Trenčín

- Criminal matter originally conducted at the District Prosecutor's Office Trenčín under ref.no. 2 Pv 519/25/3309 **in the matter** of offence Dangerous threats under Section 360 Subsection 1 of the Criminal Code (injured chief editor of the daily newspaper)
- on the factual basis that (simplified) the perpetrator via social network Facebook wrote from his user profile to the injured journalist with the use of vulgarism a message, that he needs to be shot as soon as possible, but the word shot did the perpetrator not used I full text, but in following form "sh..t"

- The said criminal matter was with the a resolution of the police officer of 22 December 2025, which was to the moment of supplying of the supporting documents not legally valid, referred to other authority for the hearing of the offence.

4. Jurisdiction of the Regional Prosecutor's Office Nitra

Updated information for 2024

- Criminal matter originally conducted at the District Prosecutor's Office Nitra under ref.no. 1 Pv 71/25/4403 **in the matter** of offence Stalking under Section 360a Subsection 1 letter b), Subsection 2 letter c), letter d) of the Criminal Code in joinder with the offence Violation of the Confidentiality of Spoken Conversation and other Personal Expressions pursuant to Section 377 Subsection 1 of the Criminal Code in the form of complicity pursuant to Section 20 of the Criminal Code (suspected journalist)
- on the factual basis that (simplified) an unknown perpetrator in the restaurant between Komárno and municipality Nová Stráž in an unspecified manner with the help of other persons ensured electronic surveillance and wiretapping of injured judge of the District Court and subsequently published article in the nationwide print medium along with on the web page, here was published the prepared audio-visual recording.

- The resolution of the police officer, with which the criminal prosecution was initiated was annulled with the resolution of supervising prosecutor of 04 March 2025
- The matter of suspicion in the specified offences was dismissed with resolution of police officer of 30 June 2025
- based on the complaint of the notifier the stated first instance decision of the police officer was annulled with the resolution of prosecutor of 27 November 2025, this criminal matter was to the moment of providing of supporting documents not in pre-court stage of criminal proceedings not effectively completed.

5. Jurisdiction of the Regional Prosecutor's Office Žilina
   - Criminal matter originally conducted at the Regional Prosecutor's Office Žilina under ref.no. 20 Kv 6/25/5500 **in the matter** of offence Incitement to National, Racial and Ethnic Hatred pursuant to Section 424 Subsection 1 of Criminal Code (suspected radio presenter)
- on the factual basis that (simplified) on 24 February 2024 during the broadcasting of the recording of the radio show in the night hours from the suspect, performing under the pseudonym, together with two currently unknown persons, performing under pseudonyms were used defamatory statements directed at transgender people and people with different sexual orientation, as a part of LGBTI+ minority

- the said criminal case was referred to another authority for the hearing of the offence with the resolution of the police officer of 01 December 2025, which up until the submission of supporting documents was not legally valid

6. Jurisdiction of the Regional Prosecutor's Office Banská Bystrica
   Updated information for 2024
- Criminal matter originally conducted at the Regional Prosecutor's Office Banská Bystrica under ref.no. 2 Pv 140/20/6601 **against the accused** of offence Slander pursuant Section 373 Subsection 1, Subsection 2 letter c) od Criminal Code (accused

Blogger)

- on a factual basis consisting (simplified) in the fact, that the accused in the time period from 08 October 2019 to 29 October 2019 on the internet portal YouTube and social network Facebook, as well as on other internet portals and social networks published publicly available videos and other posts, containing false and offensive statements about the injured parties, he tried with these statements to create an impression about committing serious property and economic crime on their part, these published videos and posts were public, the injured parties were after their publishing confronted by their clients, colleagues, family members, as well as by friends with statements regarding alleged money laundering and statements about fraudulent activity, the injured party was after the publishing of the said posts questioned by the competent authorities of Principality of Liechtenstein in connection with his company, which is financial market supervision of Principality of Liechtenstein, licenced asset manager and in connection with regular internal and external company audit, within which are the assessed risks connected with the company media profile and their representatives, also the injured was confronted after the publishing of the stated posts in the bank in Liechtenstein when opening an account.

- By the judgment of the District Court Banská Bystrica, ref. no. 1T/78/2023 of 26.09.2024, the accused was found guilty and a fine of 1,000 Euros was imposed on him (in the event of his intentional failure, an alternative sentence of imprisonment for a period of 30 days)

- by the resolution of the Regional Court Banská Bystrica ref.no. 3To 8/2025 of 19 March 2025 the said judgement of first instance was annulled and the said criminal matter legally referred to other authorities for hearing of the misdemeanour
  - the General Prosecutor filed an extraordinary appeal [on the grounds of Section 371 Subsection 1 letter i) of Criminal Code], against the mentioned legally valid resolution of Regional Court Banská Bystrica, about which no decision has been made until the moment of the submitting of supporting documents
- ▪ criminal case conducted at District Prosecutor's Office Banská Bystrica under ref.no. 1 Pv 98/24/6601 **in the matter of** offence Slander pursuant to Section 373 Subsection 1, Subsection 2 letter c) of Criminal Code (suspected Blogger)
- on a factual basis consisting (simplified) in the fact, that the accused continued in the attacks against the injured parties on the internet portals and social networks and in the time period from 08 October 2019 to 29 October 2019 on the internet portal YouTube and social network Facebook, as well as on other internet portals and basically state, that the injured parties are executing suspicious bank transactions, money laundering, that it's all verified by NAKA also in Liechtenstein, and that this all will be provided to the Court in Banská Bystrica and the injured lawyer will be finished for good.
- No substantive decision has been made in the pre-trial stage of the criminal prosecution to the moment of submitting supporting documents.

In the jurisdiction of the Regional Prosecutor's Office Prešov, and Regional Prosecutor's Office Košice no criminal proceedings connected to journalist or media in the evaluated period of the calendar year 2025 were conducted.

IV. Other institutional issues related to check and balances

A. The process for preparing, enacting and implementing laws

Ministry of Interior of the Slovak Republic: Since October 2024, a working group has been meeting regularly to amend the methodological material aimed at creating strategic and conceptual materials entitled "Methodology and institutional framework for creating public strategies".

At the beginning of 2025, the activities of the working group were suspended due to competing professional commitments of its members. In the second half of 2025, the activities of the working group were resumed, accompanied by a revision of the approach to the preparation of the methodological material. A new methodological document will be developed, which includes step-by-step guidance for civil servants responsible for participatory public policy-making. The document “Principles and Rules of Public Involvement in the Creation of Public Policies”, developed by the Office of the Government Plenipotentiary for Civil Society Development in 2022, remains a key reference framework.

Based on the task from Government Resolution No. 483/2023 on the Action Plan of the Open Government Initiative in the Slovak Republic for 2024 – 2026, Office of the Government Plenipotentiary for the Civil Society Development had created and evaluated the Open and Participatory Government Index, a tool is assessing the level of open government among the ministries. Results of the first round of evaluation (2023 - 2024) were published and are freely accessible at the official website:
https://www.minv.sk/?index_participativnej_a_otvorenej_vlady

At the same year the Office of the Government Plenipotentiary for the Civil Society Development created and evaluated the Regional Public Participation Index, this tools is aiming at the regional level of governance and provides an assessment of the capabilities to hold a meaningful participation under the lead of self-governing regions. As well as previous one, the results, full methodology and information are publicly available at the official website:
https://www.minv.sk/?index_participacie_VUC
Next round of evaluating of both indexes is planned on Q1 2026.

In the area of the educational programmes for employees of central state administration bodies, The Office of the Government Plenipotentiary for the Civil Society Development continues to run a 3 day - long educational program for employees of central state administration bodies called "Learning Institutions". Its goal is to present a strategic approach to the creation of public policies through the controlled involvement of socio-economic partners and/or the general public in the processes of their preparation. In 2025, a fifth cycle of the program was held with 25 participants from 3 central state administration bodies.
In addition to this, our office introduced a series of one day training sessions in 2025, each focused on different participatory method or approach. These sessions were designed to help civil servants to engage socio-economic partners or the public in policy making more effectively. The trainings, with about 20 participants each, took place once a month (12 trainings in total) and each explored a different method – e.g. focus groups, stakeholder mapping, or facilitation of participatory meetings:
https://www.minv.sk/?modulove_vzdelavanie

Q 44 Regime for constitutional review of laws

Ministry of Justice of the Slovak Republic: **Act No. 319/2025 Coll. amending Act No. 314/2018 Coll. on the Constitutional Court of the Slovak Republic and on amendments to certain acts, as amended, effective from 1 December 2025**

- the appointment of a legal representative by the Constitutional Court is waived in situations where a legal representative may be appointed in accordance with a special law
- the possibility of rejecting a motion to initiate proceedings on the conformity of legal regulations as manifestly unfounded is introduced
- The subsidiary application of the Administrative Court Rules in proceedings before the Constitutional Court is added
- The rules governing the discontinuation of proceedings and decision-making in proceedings concerning the conformity of legal regulations are clarified
- The mandatory publication of unfavourable findings in the Collection of Laws of the Slovak Republic is waived
- in proceedings concerning constitutional complaints, the distinction between lack of jurisdiction to hear the complaint and inadmissibility of such a complaint is abolished

Q 50 Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

Ministry of Justice: The administrative court may impose a fine on a public administration body by resolution for failing to comply with the legal opinion of the administrative court expressed in the quashing judgment. The court shall learn of the failure to comply with the legal opinion of the administrative court from the retrial based on the party's action against the decision, when the administrative body only formally repeated the proceedings and did not follow the binding legal opinion of the administrative court. A fine for breach of obligation may be imposed up to EUR 2,000, even repeatedly. If the administrative court decides to impose a fine on a motion, it is not bound by the amount of the fine stated therein.

If, in the case of a decision on another intervention, the administrative court prohibits the defendant by a resolution from continuing the contested other intervention, if possible, it shall impose on the defendant an obligation to restore the status quo ante. The issuance of this resolution does not end the court proceedings, and the defendant is obliged to deliver to the administrative court, within a specified period, a notification that it has complied with the prohibition on continuing the other intervention and restored the status quo ante, if such obligation has been imposed. If, after the specified period has expired, the defendant continues the other intervention without justification or, despite the imposed obligation, has failed to restore the status quo ante without justification, the administrative court may impose a fine on the defendant by a resolution ex officio (also in the amount of up to EUR 2,000).

There is also an extraordinary remedy of the “reopening of proceedings” according to the Code of Administrative Court Procedure. One of the grounds for permitting the reopening of proceedings is the existence of a judgment of the ECtHR which establishes, either in the operative part or in the reasoning of the judgment, that the decision of the administrative court or the procedural action immediately preceding and related to the decision of the administrative court violated the fundamental human rights or freedoms of the participant in the proceedings, provided that the consequences of this violation have not been remedied even by awarded just satisfaction.
Another ground is also that the decision of the administrative court is contrary to a decision of the Court of Justice of the European Union, the Council of the European Union, or the

Commission, which is binding on the participants in the proceedings.

B. Independent authorities

Ministry of Justice: All information provided last year in this regard still apply. Directives on standards for equality bodies adopted (2024/1499/EU and 2024/1500/EU) in 2024 are currently in process of transposition. The Ministry of Justice is finalising the legislation transposing these directives to the legislative process within the transposition stated period.

Budget and allocation of employees for the Slovak National Centre for Human Rights

Year	Budget in EUR	Average no. of employees
2025	1 098 661	**Not yet available**
2024	1 071 129	30
2023	967 002	27[30]
2022	870 287 + 74 000	25
2021	849 874	23
2020	797 822	21
2019	787 215	18
2018	565 356	16

Budget allocation for the Office of the Public Defender of Rights

Year	Budget in EUR	Allocated no. of employees
2025	2 346 167	**Not yet available**
2024	2 227 601	58
2023	2 173 875	58
2022	2 010 279	52

Information provided last year is still relevant.

Statistics of the Commissioner for Persons with Disabilities in respect of recommendations addressed to government for years 2016 – 2023 (with implementation also in 2024)

The recommendations are of different character; some include suggestions for changes of legislation while some are more general recommendations. Several recommendations are repeated every year.
All recommendations proposed to the Government of the Slovak Republic that were fulfilled in the previous period (2016–2023) are omitted from the overview in this table. Out of the total of 91 recommendations, 21 were fulfilled.

[30] Zdroj: Návrh záverečného účtu verejnej správy SR za rok 2023

Status of measures	Number of measures
Implemented (measures from 2024)	5
Partially implemented	4
Continuously implemented	10
Not implemented	11
Without relevance	1
New recommendations (issued in 2024)	5

Statistics of the Commissioner for Persons with Disabilities in respect of individual complaints

Year	Total no. of complaints	Finished	Violation	Recommendations
2024	710	408	96	50 (24 implemented, 18 being implemented, 8 denied implementation)
2023	758	634	122	36 (13 implemented, 18 being implemented, 5 denied implementation)
2022	618	559	41	25 (9 implemented, 2 being implemented, 2 denied implementation, 12 are being monitored)
2021	631	650	103	33 (24 implemented, 5 continuously implemented, 4 not implemented)
2020	685	800	75	46*
2019	660	630	64	23*
2018	518	511	121	98* (together with 2017)

Statistics of the Commissioner for Children in respect of individual complaints

Year	Total no. of complaints	Finished	Violation
2024	450	311	20
2023	406	1902	67
2022	762	not available	not available

Statistics of the Slovak National Centre for Human Rights in respect of individual complaints

Year	Total no. of complaints	On discrimination	Violation
2024	488	177	44

2023	428	177	23
2022	357	122	15

Statistics of the Public Defender of Rights in respect of individual complaints

Year	Total no. of complaints	Finished	Violation
2024	1789	1779	137
2023	1790	1902	67
2022	873	-	103

D. The enabling framework for civil society

Ministry of Interior: Due to consolidation of public financial resources, the commitment to create a state Agency for Assistance to the Non-Profit Sector is postponed.
In 2025, the Office of the Government Plenipotentiary for the Civil Society Development conducted research interviews with non-governmental organisations and local governments dedicated to the integration of foreigners and developed Recommendations for the integration of third-country nationals. The Office of the Government Plenipotentiary for the Civil Society Development supported participatory creation of strategic materials aimed at the integration of third-country nationals and migrants in four cities (Bratislava, Trnava, Prešov and Michalovce). The Office also participates in the creation of the Action Plan for the National Strategy of the Slovak Republic for Asylum and Migration Management.
Since October 2024, the Office of the Government Plenipotentiary for the Civil Society Development has been implementing the national project "Supporting the professional and coordination capacities of umbrella civil society organizations". The aim of the project is to increase the level and effectiveness of the involvement of civil society organizations in the implementation of public policies in the field of employment, education and social inclusion and topics demonstrably related to them, by building the advocacy, analytical and coordination capacities of umbrella organizations in the civil society sector and supporting intersectoral partnerships at all levels of public administration.

Fourteen umbrella civil society organizations are participating in the project:

- Alliance for Social Economy in Slovakia
- Association of Hospice and Palliative Care in Slovakia
- Association for the Protection of Patients' Rights
- Association of Social Service Providers in the Slovak Republic, civic association
- Voluntary Civil Protection
- Platform of Volunteer Centers and Organizations
- Slovak Development Organizations Platform – Ambrela
- Slovak Youth Council
- Slovak Humanitarian Council
- Slovak Catholic Charity
- Slovak Red Cross, Central Secretariat
- ŠPIRÁLA
- Union of Maternity Centers
- UNION of Regional Associations of Non-State Forest Owners

The participating umbrella civil society organizations are involved in the participatory making of public policies in cooperation with public administration entities and in the preparation and implementation of the umbrella civil society organization's development plan.
The Chamber of NGOs of the Council of the Government of the Slovak Republic for NGOs is also cooperating on the project by creating a coordination and support unit for the chamber and launching its operation.
As part of the project implementation, 65 new professional capacities were created and financially secured in umbrella organizations:

- 19 experts in the field of public policy,
- 21 membership base coordinators or participatory process coordinators,
- 25 analysts.

In 2025, EUR 1,364,000.00 was provided to umbrella civil society organizations.
In 2025, two rounds of accreditation in the field of volunteer activities took place. In the second round of accreditation, based on the recommendation of the Accreditation Commission in the field of volunteering dated June 20, 2025, we granted accreditation in the field of volunteer activities to 27 applicants. In the third round of accreditation, based on the recommendation of the Accreditation Commission in the field of volunteering dated November 4, 2025, we granted accreditation in the field of volunteer activities to 15 applicants. To date, 131 organizations working with volunteers have been accredited.
During 2025, the Office of the Government Plenipotentiary for the Civil Society Development, in cooperation with the Ministry of Labour, Social Affairs and Family of the Slovak Republic, provided financial contributions to projects supporting social innovation in the field of volunteering. The total allocation of approved applications for financial contributions amounts to EUR 1,684,636.80, which is earmarked for accredited non-governmental non-profit organizations operating in the field of volunteering. This involves a total of 53 organizations.

Update on the implementation of the new financial reporting and information disclosure obligations of civil society organisations, including information on how the national authorities engage with civil society organisations. (supplementary question):

Based on consultations with NGOs, the Ministry of Finance of the Slovak Republic drafted and issued a measure on July 29, 2025, establishing templates for financial reporting.
At its meeting on September 23, 2025, the Council of the Government of the Slovak Republic for NGOs discussed the measure and, by its resolution, requested the preparation of methodological guidelines for completing financial reporting:
https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/vseobecne/40_zasadnutie_rady_vlady_sr_pre_mno/uznesenie%20RV%20SR%20pre%20MNO%20c.%203_2025.pdf

In December 2025, based on suggestions from NGOs, the Ministry of Finance of the Slovak Republic developed and published methodological guidelines:
https://www.mfsr.sk/files/sk/dane-cla-uctovnictvo/uctovnictvo-audit/uctovnictvo/legislativa-sr/opatrenia-oblasti-uctovnictva/uctovnictvo-neziskovu-sferu/vykaz-organizaciu-medzinarodnym-prvokom-obcianske-zdruzenie-odborovu-organizaciu-neinvesticny-fond-neziskovu-organizaciu-poskytujucu-vseobecne-prospesne-sluzby-nadaciu/metodicke-usmernenie-k-vzoru-vykazu-mno.pdf

On December 17, 2025, the Constitutional Court of the Slovak Republic ruled in a closed session that certain provisions of the adopted amendment to the laws concerning NGOs were unconstitutional. Constitutional Court of the Slovak Republic issued two press releases

regarding the decision:
https://www.ustavnysud.sk/documents/20121/41393238/TS_54_2025.pdf/
https://www.ustavnysud.sk/informacie-pre-verejnost-a-media/media/tlacove-spravy?articleId=65219939
The decision itself, including the reasoning, has not yet been published (as of December 19, 2025). We will update this information once the decision will be published.

The European Commission's Joint Research Centre (JRC) has expressed interest in extending the existing memorandum of understanding with the Office of the Government Plenipotentiary for the Civil Society Development, which is currently valid until January 24, 2026. The new memorandum is proposed to be concluded for a period of two years and follows on from successful cooperation in 2024–2025.
The focus of the proposed cooperation is the development of a Centre for Participatory Excellence in Slovakia. The Plenipotentiary's Office has created a specialized Participatory Unit, which, in cooperation with the European Commission's Competence Centre for Participatory and Deliberative Democracy, will explore the possibilities of establishing a Centre for Participatory Excellence as a strategic organizational capacity. The starting point will be the model of the European Commission's Competence Centre, which is to be adapted to the Slovak legal and institutional context. The Centre is to contribute to the systematic involvement of citizens and civil society in public policy-making in line with EU recommendations.
The memorandum also provides for deeper cooperation in the areas of sharing methodologies, evaluating participatory processes, developing public administration capacities, education, and mutual learning. The aim is to strengthen Slovakia's expertise in the field of participatory and deliberative democracy and to create a sustainable framework for quality participation at all levels of public administration.

Office of the Government of the Slovak Republic:

The Constitutional Court of the Slovak Republic, in a closed plenary session on December 17, 2025, in the case filed under ref. no. PL. ÚS 11/2025, ruled that Act No. 109/2025 Coll. Amendment to the Law on Non-profit Organizations was in conflict with the Constitution of the Slovak Republic. At present, only the press release has been published and the Constitutional Court's decision has not been published in its entirety, so we cannot make a statement on it.
Polarization of society is a phenomenon that has a significantly negative impact on the rule of law and democratic culture; therefore, the Slovak Republic is adopting measures to strengthen social cohesion and to develop social dialogue. In 2024, the Office of the Government of the Slovak Republic launched the project #RešpektujemInýNázor (I respect other opinions), which successfully continued in 2025. The campaign, which is part of the state's strategic communication, highlights the importance of factual and respectful discussion in society. As part of the project, the Office of the Government, in cooperation with the Student Council of Secondary Schools, organizes a series of discussions on current social issues, with participants representing different parts of the opinion spectrum.

In 2024, the position of Government Plenipotentiary for Social Dialogue was established, and the Declaration on the Development of Nationwide Social Dialogue in the Slovak Republic was adopted. Its aim is to support open nationwide discussion, social cohesion, and the search for consensus on important issues. Through the Declaration, the Permanent Conference on Nationwide Social Dialogue in the Slovak Republic was established, representing a significant element in the development of the Slovak Republic as a democratic state governed by the rule of law, as an active member of the European Union, and as an active participant in international structures in support of the humane and peaceful development of human civilization. Participants in the Permanent Conference are primarily representatives of civic associations, self-governing authorities, academic institutions, public-law organizations, churches, and the government, and it is open to the inclusion of additional entities.

Q 55 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.

Ministry of Justice: The Slovak legal system does not grant civil society organisations any special status in terms of protection against attacks; therefore, they are subject to the same legal regime and safeguards that apply to all legal entities in general.

Slovakia has a comprehensive legal framework addressing hate crimes and hate speech. Hate-motivated offences against civil society organisations, hate speech, racism and radicalisation are subsumed under the category of "extremist crimes".

Section 140(e) of the Criminal Code defines a special motive as the commission of a criminal offence out of hatred against a group of people or an individual on the grounds of their actual or perceived affiliation with a particular race, nation, nationality, ethnic group, their actual or perceived origin, skin colour, sex, sexual orientation, political opinion or religious belief. A special motive forms part of the qualified elements of criminal offences, meaning that a higher penalty is imposed for such crimes.

Dangerous stalking (cyberstalking) is regulated under Section 360a of the Criminal Code. Section 360b of the Criminal Code defines the elements of the offence of dangerous electronic harassment, which provides protection against long-term intimidation and harassment that may be considered a potential tool of attacks against civil society.

Protection against hacking or smear campaigns in the online environment falls within the agenda of the National Security Authority (NBÚ) and specialised police units (e.g., the Cybercrime Department).

The public perception of civil society organisations and public opinion are subject to civil-law protection. Under the media law, organisations have the right to respond to false factual statements published in the media.

Q 56 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)

Ministry of Justice: The Ministry of Justice supports civil society organisations through grant schemes regulated under Act No. 302/2016 Coll. on the Provision of Grants within the Competence of the Ministry of Justice of the Slovak Republic, in two areas:

1. Promotion, support and protection of human rights and freedoms, and prevention of all forms of discrimination, racism, xenophobia, antisemitism and other manifestations of intolerance.
2. Provision of professional assistance to victims of criminal offences.

Within the first grant area, projects aimed at preventing all forms of extremism and radicalisation were prioritised in 2025, with a total financial allocation of EUR 769,500.
The second area consists of two grant schemes, both intended for entities holding accreditation (i.e., meeting the statutory requirements for performing the respective activity):
a) Provision of professional assistance to victims of criminal offences, with a total financial allocation of EUR 450,000. b) Provision of specialised professional assistance to victims of the criminal offence of domestic violence, with a total financial allocation of EUR 1,600,000.

The grants are distributed in accordance with Act No. 302/2016 Coll. on the Provision of Grants within the Competence of the Ministry of Justice of the Slovak Republic and on Amendments to Certain Acts, and Decree No. 322/2016 on the composition, decision-making, organisation of work and procedures of the commission for evaluating grant applications, and on the criteria for evaluating grant applications.

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.[31]

Ministry of Justice: **Draft law on Commercial Register, LP/2025/129, is at the moment in the first reading in the Parliament.** The aim of the draft law is to create a comprehensive substantive and procedural approach to the regulation of the commercial register so that most of the rules that are currently partially regulated in various legal regulations are concentrated in a single legal regulation. The bill is intended to contribute to reducing the administrative burden on entrepreneurs and commercial companies The proposed legislation does not impose any new administrative obligations on persons registered in the commercial register in relation to already registered data – all entries currently contained in the commercial register remain valid without the need for supplementation or modification. In connection with the initial registration of commercial companies, it is now possible to submit an application for registration without providing a trade license. In the case of a clearly specified range of free trades, the company's trade license will be created upon registration in the commercial register. This allows entrepreneurs to speed up and simplify the process of establishing a company.

Additional information of the Ministry of Justice of the Slovak Republic on the other adopted and proposed laws related to the Rule of Law

I. Act No 327/2025 Coll. amending Act No. 475/2005 Coll. on the execution of

[31] 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.

imprisonment and amending certain acts, as amended, and amending certain acts

The aim of the proposed amendments is to regulate the principles of movement and the possibility of mutual contact between convicts and convicts with other persons, changes in the level of security, the rights and obligations of persons serving prison sentences, disciplinary responsibility, the enforcement of prison sentences for special categories of convicts, in particular those sentenced to life imprisonment, and the specialised enforcement of prison sentences, especially in security regime sections, thereby achieving the highest possible level of effectiveness in the humanisation of the enforcement of prison sentences.

The draft law harmonises the classification criteria with ensuring the purpose of the safe enforcement of imprisonment, by transferring the change of security level to the jurisdiction of the Prison and Judicial Guard Corps (hereinafter referred to as the "Corps") so that the security level is adapted to the convict and not to the crime, because the punishment imposed for the same crimes does not affect all convicts equally.

II. Act No. 416/2025 Coll. amending and supplementing Act No. 300/2005 Coll. Criminal Code, as amended, and amending and supplementing certain acts

Sections 119 and 168(1) of the Act No. 301/2005 Coll. Criminal Procedure Code are amended following on from the case law of the ECtHR (e.g. in the case of Adamčo v. Slovak Republic), by specifying in more detail the inadmissibility of evidence obtained through the provision of an illegal benefit and the court is expressly instruct to address in the grounds for its judgment the credibility of the cooperating person to whom the benefit was provided.

Amendment is the MPs´ proposal. Justification provided by the members of the Parliament in the amendment is as follows:

> The regulation of cooperating defendants in Act No. 40/2024 Coll. has proven to be insufficient in practice. In practice, it is still possible to encounter abuse of the institution of cooperating accused (so-called "penitent") and the conviction of persons based solely on the testimony of these persons, who have proven to be untrustworthy by making false statements in their other testimonies. Because the courts do not adequately assess their credibility and the possible conviction of such penitent persons for the crime of false testimony and perjury under Section 346 of the Criminal Code, it is relatively complicated and lengthy from the point of view of criminal proceedings. Taking into account the case law of the European Court of Human Rights (e.g. in the case of Adamčo v. Slovak Republic), it is proposed to specify in more detail the inadmissibility of evidence obtained through the provision of an unlawful benefit. The court is also expressly required to address the credibility of the cooperating person to whom the benefit was provided in the reasoning of the judgement.

III. Draft law, amending and supplementing Act No. 550/2003 Coll. on probation and mediation officers and on amendments and supplements to certain laws, as amended, and amending and supplementing certain laws, LP/2025/421

Draft law is expected to be submitted to the meeting of the Government for approval in the first quarter 2026.

The aim is to refine the individual activities of probation and mediation officers into a more precise form that strengthens their mandate and corresponds to European standards.

The aim of the draft is also to streamline and reduce bureaucracy in the processes between probation and mediation officers and courts, including by transferring powers from judges to probation and mediation officers in selected alternative punishments, particularly community service.

The aim of the draft is to streamline and speed up the process of enforcing community service by transferring powers from the presiding judge to the probation and mediation officer, specifically the implementation and ordering of community service, as the current procedure appears to be inefficient in terms of speed and effectiveness.

IV. Draft law on international judicial cooperation in criminal matters, LP/2025/605

The aim of the proposed draft law is to consolidate the legal regulation of international judicial cooperation in criminal matters, with the purpose of clarifying and simplifying the use of instruments and institutions used in legal relations with foreign countries and eliminating shortcomings in their application in practice.
One of the reasons for drafting comprehensive separate legislation is to harmonize judicial cooperation in criminal matters with EU Member States, which, given its specific nature and system, is an area of particular importance in terms of its frequency of use by judicial authorities.
At the same time, it regulates a new form of judicial cooperation in criminal matters, namely direct cooperation between the competent authorities and providers of selected services in the digital space for the purpose of securing electronic evidence.
The legal regulation of judicial cooperation in criminal matters will be *lex specialis* to the provisions of the Criminal Code and the provisions of the Criminal Procedure Code, which will be applied subsidiary.

Draft law is expected to be submitted to the meeting of the Government for approval in the second quarter 2026.

V. Draft law on certain measures related to the adoption of the law on international judicial cooperation in criminal matters, LP/2025/607

The new legislation on international judicial cooperation in criminal matters represents a necessary revision of individual specific laws governing judicial cooperation in criminal matters and supplements and revises Part Five of Act No. 301/2005 Coll. The Criminal Procedure Code, which is repealed by this draft law and incorporated into the draft law on international judicial cooperation in criminal matters.
Based on the repealed fifth part of the Criminal Procedure Code, it became necessary to amend two institutions (taking into account convictions by courts of European Union member states and conducting interrogations via videoconferencing equipment from the diplomatic mission of the Slovak Republic abroad) in the general provisions of the Criminal Procedure Code.
The draft law also covers procedural steps for storing, submitting, and releasing computer data. The aim of the proposed legislation is to harmonize the above-mentioned issues with European Union legislation and it also reflects the legal provisions of the new UN Convention on Cybercrime of 2024. The aim of the proposal is to eliminate current

application problems and ensure a higher level of legal certainty and predictability in the application of legal norms in this area. The proposal responds to technological advances in this area, as well as to the case law of the national courts, Court of Justice of the European Union and the European Court of Human Rights. In accordance with this case law, it regulates, for example, procedural guarantees in relation to individual orders, such as the obligation to duly justify the order, inform the person concerned, or destroy the copy of the data if no facts relevant to the criminal proceedings have been found.

Draft law is expected to be submitted to the meeting of the Government for approval in the second quarter 2026.

VI. Draft law on Civil Code, LP/2025/486

Draft law is expected to be submitted to the meeting of the Government for approval in the second quarter 2026.

The aim of the draft law is:
- to remove the relics of the socialist approach to private law, i.e. to remove provisions that are still in force today and are characteristic of the period in which they were created, as provisions only for basic, typical situations without the possibility of deviating from the mandatory wording of the law,
- modernize private law by introducing missing institutions that every modern European private law regulation recognizes and works with,
- to enhance the importance of autonomy of will in such a way that the new Civil Code is to be the cornerstone of free consideration and choice of each individual on how they want to live and organize their life situations so that state interference in this is minimal,
- to unify a substantial part of private law by eliminating duplication of legal regulations and transferring regulations from special regulations to the Civil Code wherever it makes sense and brings added value,
- make the private law system more transparent and clearer, and thus better link the regulations that will remain in special regulations with the provisions of the Civil Code, and clarify and unify the relationships between them, including terminology.

The new Civil Code will be a central general code of private law with a broad scope, covering the widest possible range of private law relationships, thereby ensuring the uniformity and clarity of the legal system.

As regards the publication of your written input, please indicate whether you[32]:

x Consent

☐ Do not consent

***Annexes**:*

- *Instruction of the Prosecutor General of the Slovak Republic, No. 17/2025 of 30 December 2025 on the establishment of specialization of prosecutors for criminal offences of corruption (in Slovak)*
- *GPO Corruption Statistics*

[32] 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.