

2026



HELLENIC REPUBLIC

Complementary Contribution Rule of Law 2026



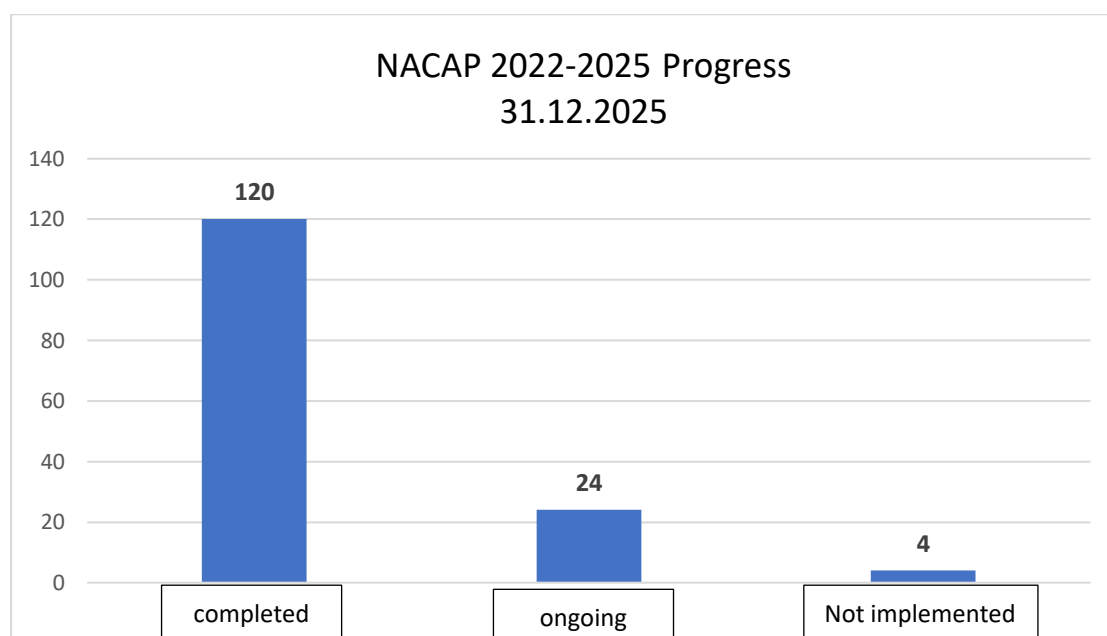
NATIONAL TRANSPARENCY AUTHORITY

Athens, 12 March 2026

1. The 2026 – 2030 NACAP is under consultation and expected to be adopted in Q2 2026. Could you provide us with a preview of what it will contain? Has the Strategy covering the previous period been fully implemented? Is there a concluding implementation report?

The new NACAP 2026 - 2030 builds on lessons learnt from the implementation of previous strategies, international good practices and internal and External evaluation findings as well as national priorities. The Strategy is expected in Q2 2026 after its approval by the Ministerial Council. After a national corruption risk assessment that took place in 2025 and the final external evaluation in February 2026, the new strategy will contain more than 180 actions from all high-risk areas, to be implemented by all Greek Ministries.

As regards the final implementation report of NACAP 2022-2025 it is expected by the end of March. The following table summarizes progress achieved by the end of the implementation period.



Out of the 28 ongoing or not implemented actions 18 will be transferred in NACAP 2026-2030.

ACTIONS TO BE INCLUDED IN NACAP 2026-2030		
Action Code	Action	Implementing Body
1.1.5	Ratification of Law for the accession of Greece to the MEDICRIME Convention of the Council of Europe, with the aim of combating counterfeit medical products	Ministry of Health
1.1.9	Update of regulations and implementation of the licensing process for media service providers, within the framework of regulating the television field	General Secretariat for Communication and Information
1.1.10	Update of regulations and implementation of the licensing process concerning radio stations	General Secretariat for Communication and Information
1.4.2	Provision of a Business Intelligence/Data Analysis System to support the audit work of the IAPR	Independent authority for public revenue (IAPR)
1.4.18	Development of artificial intelligence tools (machine learning) to enhance NTA's audits	National Transparency Authority
2.1.3	Codification of legislation: a) Code of Spatial Planning and Urban Planning & b) Forestry Legislation	Ministry of Environment and Energy
2.1.4	Codification of legislation for first- and second-degree local authorities	Ministry of Interior
2.1.7	Codification of consumer protection legislation	Ministry of Development and Investments
2.2.16	Completion of the national cadastre	Ministry of Digital Governance
2.2.17	Simplification and publication of selected procedures of priority in the National Registry of Procedures	Ministry of Digital Governance
2.2.21	Drafting a Practical Code for Conflicts of Interest	National Transparency Authority
2.3.1	Drafting of Codes of Professional Conduct for civil servants in financial services	Ministry of Interior - National Transparency Authority
2.3.4	Development of a Code of Conduct for correctional officers	Ministry of Civil Protection
2.3.10	Update of training material for trainers and trainees concerning the Certification Program of Public Sector Internal Auditors	Ministry of Interior - National Transparency Authority

ACTIONS TO BE INCLUDED IN NACAP 2026-2030		
Action Code	Action	Implementing Body
2.3.21	Update of a Code of Conduct for Police Officers	Ministry of Citizen Protection
2.3.22	Drafting a Code of Professional Conduct for civil servants in infrastructure services	Ministry of Interior - National Transparency Authority
2.4.3	Upgrading of the “ΔΙ@ΥΓΕΙΑ” program	Ministry of Digital Governance
2.4.6	Expansion of the Integrated System for the Management of Judicial Cases of Civil & Criminal Justice to ensure the full digitisation of the judicial process	Ministry of Justice

2. Despite your extensive awareness-raising efforts, the number of registered lobbyists and declared meetings remains persistently low. In your view, what are the key reasons for this? What further measures could be taken to improve compliance?

NTA focuses on informing all liable public officials and lobbyists about their obligations. To this end, information and awareness-raising activities were carried out among both institutional actors and potential interest representatives, prioritizing legal and ethical aspects of lobbying.

In 2026 several awareness raising efforts are scheduled. In cooperation with the Ministry of Interior, NTA, is designing actions to disseminate information to institutional actors obliged to submit annual declarations. The launch of the campaign (first RA event) took place on 09.03.2026 targeting members in the Cabinet of line Ministries. The roll out of the RA campaign will take place in S2 2026.

The number of registered interest representatives and declared meetings remains low reflecting among other structural and cultural causes the fact that the scope of the law concerning the definition of interest representatives is narrow.

An expansion of the definition of 'interest representative' is a policy option that should be examined by the competent ministry in the near future in order to include “in-house” lobbyists, associations, professional unions, chambers, and Civil Society bodies.

3. The 2025 Rule of Law Report recommended expanding the definition of a lobbyist to include in-house lobbying. Are there plans to implement this recommendation, and if so, what is the expected timeline?

NTA proposes that a comprehensive assessment of the existing framework takes place prior to any review of the legal framework. Based on the findings of this exercise, a potential extension of the

scope of Law 4829/2021 could be considered. At this end, NTA is interested in exploring potential EU funding opportunities.

4. [in writing] Have you received annual declarations for lobbying activities in 2025 by all registered persons and legal entities for the reference year?

With regard to the submission of annual declarations for lobbying activities for the reporting year 2025 (reference year 2024), the obligation applies to all registered natural and legal persons under Law 4829/2021, who are required to submit an annual activity report within the prescribed deadline.

By the end of the reference year 2024 the total number of registered interest representatives who were obliged to submit an annual declaration in reporting year 2025, were thirty-three (33); fifteen (15) self-employed natural persons, six (6) legal entities, one (1) Civil Non-Profit Legal Entity and one (1) Non-Profit Association. Ten (10) of them did not submit annual declarations.

5. [in writing] How many verifications and inspections of information in the Transparency Register have been carried out since July 2025? Have you found any irregularities? If yes, have these been investigation and were there any sanctions imposed?

According to NTA's latest annual report,

No complaints were submitted regarding potential violations of interest representatives' obligations.

No audits had been conducted, either following complaints or ex officio.

No sanctions have been imposed to date.

Any future sanctions and audit results will be published in the Transparency Register.

6. It seems that the new electronic system for submissions of asset declarations is increasingly being used. Can you elaborate on the following:

- a. What is the concrete impact of this on the ground?
- b. What is the follow-up?
- c. Which proportion of asset declarations is verified?
- d. Which actions are taken if irregularities are discovered (e.g. sanctions)?

The main advantages of the new electronic system for the submission of asset declarations are the following:

- Enhances interoperability services with other databases, such as those of banks, notaries, land registries, and the Independent Authority for Public Revenue (IAPR)
- Improves the accuracy of submitted data
- Allows easier crosschecking in real time
- Incorporates risk analysis tool
- Provides a user-friendly interface

The competent authority to provide requested data is the Special Service for Asset Declarations Audits of the Greek Parliament. The Director of the aforesaid Service is appointed as the National Co-ordinator according to the provisions of the Law.

7. What can be done to overcome the obstacles that arise concerning the timely submission of asset declarations? We note that the submission deadline was extended this year, and the asset declarations were published several months after the 3-month deadline defined by law. What are the factors, in your view, that contribute to the delay, e.g. lack of qualified personnel, delays on the part of the subjects submitting the declarations?

In 2025, the submission deadline was extended, and the asset declarations were published several months after the 3-month deadline defined by law.

- The operationalization of the new functionalities took place almost in parallel with the submission of the declarations. This has proven an extremely demanding task.
- Developing new interoperability services with the financial institutions, banks, notaries, land registries, and the Independent Authority for Public Revenue (IAPR) was highly technical and time consuming to materialize.
- Several interconnection problems (compatibility) occurred during the Beta testing thus delaying the full operationalization of the new functionalities.

In 2026, NTA does not expect delays in the submission of asset declarations.

8. Have any steps been taken to implement GRECO's recommendation to oblige political advisors to submit asset declarations and to make sure they are subject to the highest standards of integrity? If yes, can you elaborate on what are those steps?

The existing legislative framework covers special/political advisors (pls see Law 4940/2022).

Furthermore, a [Code of Conduct](#) was drafted and published by the NTA, in January 2025.

Following to the above, we expect that GRECO will consider the recommendation fulfilled (initially assessed as partially fulfilled) in their next compliance report.

The competent authority to provide requested data is the Special Service for Asset Declarations Audits of the Greek Parliament. The Director of the aforesaid Service is appointed as the National Co-ordinator according to the provisions of the Law.

9. [in writing] How many whistleblowers reports on corruption have you received in the past year and what was the follow-up? As the main external reporting channel, are you satisfied with the way the system is working?

During 2025, 74 reports were submitted,

out of which

- Sixty-seven (67) reports were archived.
- Four (4) of them are under examination,

- three (3) of them were forwarded to other competent authorities (one (1) to Hellenic Competition Commission, one (1) to Economic Prosecutor and one (1) to Economic Prosecutor and the Independent Authority for Public Revenues (IAPR).

10. Have you referred any cases of corruption to the police, the prosecution, the Court of Audit or other relevant authorities?

In 2025, out of the 737 audit reports NTA identified the following:

Indications of disciplinary and/or criminal liability	Number of Audit Reports
Disciplinary liabilities	88
Disciplinary and criminal liabilities	27
Criminal liabilities	22

The above disciplinary, criminal, and disciplinary and criminal liabilities were sought by **295** natural persons while disciplinary liabilities were sought by **271** natural persons. **Local Government Authorities** (First and Second Degree) concentrate 56% of cases, while Legal Entities Governed by Public Law concentrate 16,95% and Ministries 12,2%.

11. The situation of NTA's resources seems to have slightly improved in the past months (10 posts filled in 2025), but many positions still remain unoccupied. What is your assessment of the human resources situation?

Regarding, human resources situation please note that on the 21st of January a new call for eighty-three (83) posts of inspectors-auditors was issued. On the 20th of February the deadline for applications was expired and next phases of the procedures are currently ongoing. It is expected by the end of the year. As regards the posts, 62 out of 83 posts will cover central offices' Directorates while 21 posts will cover NTA's regional Directorates. Further economic incentives along with specific regulatory provisions for the secondment of Investigators would greatly enhance NTA's ability to attract talent.

12. Do you have any updates on the compliance and enforcement of the Code of Conduct for Public Procurement Professionals or of other Codes of Conduct (e.g. for Political Appointees and Special Advisors, for Members of Government and Members of Parliament, and for the Police)?

Although breaches of Code of Conducts are often included in disciplinary procedures when disciplinary offenses are examined and discussed, there is not in use a strict reporting system on their compliance and enforcement since code of conducts are considered as soft law. As regards the Codes mentioned in the question, they are all publicly available at NTA's website for their broader dissemination.

The Code of Conduct for Public Procurement Professionals is included in the specialized courses provided by the National Center for the Central Administration and the Local Government to all public procurement professionals.

13. Have you observed any changes or trends in corruption high-risk sectors over the past year? Which are the sectors most vulnerable to corruption?

In 2025 NTA received **4.736¹** complaints compared to **3.058²** in 2024. As regards the trend in corruption high-risk sectors, no significant changes are observed. An indicative percentage distribution in the Central Service Sectors/Directorates of the complaints received in 2025 is shown below:

Incoming Complaints to the NTA	2025 (%)	Change (%)	Change (%)
Local Government	32,10%	10,32%	-2,83%
Social Security	19,25%	0,37%	0,51%
Health and Welfare	13,84%	-2,3%	0,80%
Economy and Development	12,59%	-1,95%	-0,87%
Education, Research - Technology, Culture & Sports	7,04%	-1,40%	-0,98%
Spatial Planning	5,34%	-1,68%	1,03%
Environment, Energy and Communications	3,95%	-2,95%	2,71%
Public Works & Transport	4,97%	-0,10%	-1,19%

Supplementary Question received on 04.03.2026

According to legislation, both public and private entities are required to establish internal reporting channels and appoint an Internal Reporting Officer (IRO). There is no publicly available information on whether such an IRO has been appointed on the Ministry of Interior's website. Could you please confirm there is an IRO appointed and whistleblower protection ensured? How would you assess in general the implementation of whistleblower protection rules in Greece?

According to the provisions of L. 4990/2022 public entities which are not obliged to appoint an Integrity Advisor have the obligation to appoint an Internal Reporting Officer (IRO). NTA is the competent authority to monitor compliance of public sector entities with the provisions of the said Law.

¹ including complaints on mobbing

² including 28 complaints on mobbing

In 2025, public entities issued 222 decisions for the appointment of IROs as follows:

Type of Organisation	No of IRO Decisions
Hospitals - Regional Health Authorities	85
Local Government Entities 1 st Degree (Municipalities)	62
Legal Persons of Public and Private Law Independent Authorities	53
Ministries	8
Decentralized Administrations	5
Universities	5
Regions	4
Sum	222

Integrity advisors have been appointed to **11 Ministries** including the Ministry of Interior (Moi). Data are available at the Registry of Integrity Advisors currently published online <https://www.ypes.gr/mitroo-symvoulon-akeraiotitas/>

- MINISTRY OF CULTURE
- MINISTRY OF LABOR AND SOCIAL SECURITY
- MINISTRY OF INFRASTRUCTURE AND TRANSPORT
- MINISTRY OF ENVIRONMENT AND ENERGY
- MINISTRY OF MIGRATION AND ASYLUM
- MINISTRY OF SOCIAL COHESION AND FAMILY
- MINISTRY OF EDUCATION, RELIGIOUS AFFAIRS AND SPORTS
- MINISTRY OF JUSTICE
- MINISTRY OF NATIONAL ECONOMY AND FINANCE
- MINISTRY OF DEVELOPMENT
- MINISTRY OF INTERIOR



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