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FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in central Governments (top executive functions) and law enforcement agencies

COMPLIANCE REPORT

ITALY

Adopted by GRECO
at its 103rd Plenary meeting (Strasbourg, 8-12 June 2026)

G R E C O
Group of States against Corruption
Groupe d'États contre la corruption

COUNCIL OF EUROPE
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I. INTRODUCTION

1. The fifth GRECO evaluation round concerns "Preventing corruption and promoting integrity in central Governments (top executive functions) and law enforcement agencies".

2. This Compliance Report assesses the measures taken by the authorities of Italy to implement the recommendations made in the Fifth Round Evaluation Report on Italy which was adopted by GRECO at its 96th plenary meeting (18-22 March 2024) and made public on 28 August 2024.

3. As required by GRECO's Rules of Procedure,[1] the authorities of Italy submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 31 December 2025 and served as a basis for this Compliance Report.

4. GRECO selected Iceland (in respect of top executive functions in central Governments) and the Republic of Moldova (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Ásthildur Valtýsdóttir, on behalf of Iceland, and Mr Alexandru Cladco on behalf of the Republic of Moldova. They were assisted by GRECO's Secretariat in drawing up this report.

5. The Compliance Report assesses the implementation of each individual recommendation contained in the Evaluation Report and gives an overall appraisal of the level of the member's compliance with these recommendations. The implementation of any outstanding recommendations (partly or not implemented) will be assessed on the basis of a further Situation Report to be submitted by the authorities 18 months after this Compliance Report is adopted.

II. ANALYSIS

6. GRECO addressed 19 recommendations to Italy in its Evaluation Report. Compliance with these recommendations is dealt with below.

Preventing corruption and promoting integrity in central Governments (top executive functions)

Recommendation i

7. *GRECO recommended that all persons with top executive functions undergo integrity checks as part of their appointment or recruitment in order to prevent and manage potential conflicts of interest.*

[1] The compliance procedure for the Fifth Evaluation Round is governed by GRECO's Rules of Procedure as amended. See Rule 31 revised bis and Rule 32 revised bis.

8. The Italian authorities indicate that, following the GRECO Evaluation Report, the Italian system of integrity checks in the context of appointments to senior managerial positions has undergone significant consolidation, both at the regulatory and operational levels.

9. The Integrated Plan of Activities and Organisation (PIAO) 2026-2028 of the Presidency of the Council of Ministers, adopted by Prime Ministerial Decree of 8 April 2026, formalised an operational model based on three mandatory sequential phases, directly addressing GRECO's concerns regarding the insufficiency of self-declarations and the absence of specific checks. The first phase provides for the prior submission of a declaration demonstrating the absence of grounds for non-eligibility for appointment, which is a condition for the effectiveness of the appointment rather than a mere formal requirement. The second phase requires the relevant structures to obtain declarations containing a complete list of positions held, convictions incurred and the absence of conflicts of interest. The third phase, with regard to declarations concerning non-eligibility and incompatibility in relation to managerial positions, entrusts the Department for Personnel with carrying out random checks on the accuracy of submitted declarations, by selecting 10% of all declarants, with an annual report to the Anti-Corruption and Transparency Prevention Officer (RPCT) on the outcome of such checks. This procedural architecture introduces a level of substantive verification that goes beyond the declaratory system described in the Evaluation Report.

10. The personal scope of the system has also been significantly extended. As regards Extraordinary Commissioners appointed upon proposal of the Prime Minister or Ministers without portfolio – a category not addressed in the Report – declarations concerning the absence of conflicts of interest are obtained either by the Department for Administrative Coordination (DICA) or by the offices of direct collaboration of the proposing authority, and reference thereto is included in the appointment decree.

11. At the level of the national strategy, the National Anti-Corruption Plan (PNA) 2025, adopted on 28 January 2026, introduced under Strategic Line 4 the objective of adopting standardised declaration models (Action 4.1.2) and strengthening random checks on 5% of appointments granted annually (Action 4.2.2), thereby extending the approach adopted by the Presidency of the Council of Ministers to the entire public administration system.

12. GRECO takes note of the information provided. The new Integrated Operational Plan of the Presidency of the Council of Ministers (PIAO) and the New National Anti-Corruption Plan (PNA) undoubtedly include innovative measures for mapping corruption risks and effectively managing conflicts of interest, including those involving senior positions in the central administration, particularly given the standardisation of declaration forms and the more rigorous controls now imposed on the relevant offices. Nevertheless, it remains unclear whether this regime also applies to members of the offices of direct collaboration of ministers and to holders of Government posts (ministers, undersecretaries, special commissioners).

13. GRECO concludes that recommendation i has not been implemented.

Recommendation ii

14. *GRECO recommended that a systemic analysis of corruption and integrity-related risks covering all persons with top executive functions be carried out on a regular basis and that corresponding remedial measures be included in a dedicated anti-corruption programme and made public.*

15. The Italian authorities recall that the Evaluation Report had noted that the PIAOs and risk registers, although covering the offices of direct collaboration, focused primarily on administrative and managerial functions rather than political activities, thus leaving politically exposed top executive functions (PTEFs) strictly speaking outside the risk analysis system. Developments subsequent to the evaluation have strengthened the framework in several respects.

16. The PIAO of the Presidency of the Council of Ministers has structured a two-tier monitoring system composed of distinct and complementary levels, ensuring the periodic and systematic approach required by the recommendation. The first level entrusts Heads of Structures with conducting an annual self-assessment of the anti-corruption measures falling within their competence and submitting, by 15 November each year, a report to the RPCT on the state of implementation and any difficulties encountered. The second level is entrusted to the RPCT, acting with the support of the Service for Transparency and Integrity and the internal control bodies, on the basis of the reports received, whistleblower reports, media reports and judicial decisions. This architecture ensures that risk analysis does not remain a static exercise but instead feeds into a continuous review cycle. In support of this system, the PIAO 2025-2027 developed the CIP – Interactive Catalogue of Processes – a digital simplification tool designed to effectively integrate process mapping and related corruption risks. Within the CIP, the relevant stakeholders for each structure were also identified.

17. During 2025, the Presidency of the Council of Ministers launched a process to review its risk management system, with the aim of enhancing the involvement of all relevant actors in the management of corruption risks (primarily managers) while at the same time promoting, in an increasingly effective and widespread manner, a culture of corruption prevention and transparency. The implementation of the Corruption Risk Management System (SGRC) of the Presidency of the Council of Ministers is currently being tested.

18. The PIAO 2026 identified among its strategic objectives the development of a new corruption risk assessment model and the launch of a process to involve those general structures that have not yet initiated or completed risk mapping activities, with specific indicators and responsible entities identified. This programmatic commitment extends over the entire 2026-2028 period, thus responding to the requirement of regularity and of a systematic approach set out in the recommendation.

19. As regards transparency requirements, the Management Board of the Office for the Coordination of Integrity (UCI) annually certifies compliance with publication

obligations: for the 2025 reporting year, such certification confirmed overall compliance with transparency obligations.

20. The most significant systemic development is the PNA 2025, adopted on 28 January 2026, which introduces for the first time a three-year national anti-corruption strategy (2026-2028) structured around six strategic lines, twelve objectives and thirty-one concrete actions accompanied by measurable indicators and verifiable annual targets. This represents a qualitative leap compared to the previous approach consisting merely of methodological guidance to public entities and reflects the international standards recommended by major international organisations, including the Council of Europe. The strategy integrates risk analysis with corrective measures, monitoring mechanisms, and accountability tools, thereby constituting precisely the "dedicated anti-corruption programme" required by the recommendation

21. GRECO takes note of the information provided. Although the new Anti-Corruption Action Plan (PIAO) of the Presidency of the Council of Ministers undoubtedly presents a more structured system for analysing corruption risks than the previous one, it is once again unclear whether the new measures also apply to PTEFs, or whether they are intended solely for employees, including those at the managerial level. GRECO recalls that the Evaluation Report had, as the Italian authorities recall, specifically noted a failure to consider the risks arising from the political activities carried out by PTEFs. The information provided does not enable GRECO to conclude that the situation has changed in this respect.

22. GRECO concludes that recommendation ii has not been implemented.

Recommendation iii

23. *GRECO recommended that (i) that code(s) of conduct for persons with top executive functions be adopted, published and complemented with clear guidance regarding conflicts of interest and other integrity related matters (such as gifts, contacts with third parties, outside activities, contracts with state authorities, the handling of confidential information and post-employment restrictions) and (ii) that such code(s) be coupled with a credible and effective mechanism of supervision and sanctions.*

24. The Italian authorities refer to the adoption, by Prime Ministerial Decree of 13 December 2024, of the Code of Conduct and Protection of Dignity and Ethics for Managers and Employees of the Presidency of the Council of Ministers. The Code supplements the provisions of Presidential Decree No. 62/2013 with provisions specific to the administration at the highest level of Government. It applies to all personnel serving in any capacity within the Presidency of the Council of Ministers – expressly including senior officials and personnel "also serving within offices of direct collaboration with political authorities". Its provisions also apply, where compatible, to consultants, collaborators, and economic operators. The Code is publicly accessible in the "Transparent Administration" section of the Presidency's website.

25. As regards the second part of the recommendation, the PIAO of the Presidency of the Council of Ministers provides for a structured and operational chain of responsibilities: managerial staff supervise the implementation of the Code and promote awareness thereof; heads of departments and/or offices report annually to the RPCT with specific reference to disciplinary proceedings initiated; the Department for Personnel reports to the RPCT on sanctions imposed by the Disciplinary Proceedings Office (UPD); and the RPCT itself is vested with sanctioning powers – expressly foreseen as an institutional function pursuant to Article 15 of Legislative Decree No. 39 of 2013 and the "Guidelines on the assessment of non-eligibility and incompatibility of administrative appointments by the Anti-Corruption Prevention Officer", adopted by ANAC Decision No. 833 of 3 August 2016 – for the purpose of establishing individual liability in matters of non-eligibility and incompatibility.

26. GRECO welcomes the adoption and the publication of the Code of Conduct and Protection of Dignity and Ethics for Managers and Employees of the Presidency of the Council of Ministers. It notes that article 2, paragraph 1 of the Code expressly states that its provisions apply to "all personnel in service in any capacity, including those in leadership positions, […] including those in positions of direct collaboration with political bodies, and to holders of positions of any type, including those held on a pro bono basis". While this scope covers members of the offices of direct collaboration in a broad manner, and even extends to consultants and other collaborators, it does not seem to include the political officeholders themselves. In terms of content, the Code replicates and supplements the provisions of the general code of conduct for public administration employees, comprehensively addressing the main aspects of an integrity system. The first part of the recommendation is, therefore, partly implemented.

27. As regards the second part of the recommendation, GRECO is satisfied that the supervision and enforcement system foreseen by the new PIAO of the Presidency of the Council of Ministers is adequate and includes sanctions. Similarly to the Code and to the PIAO itself, it does not, however, apply to the ministers themselves. GRECO encourages the Italian authorities to pursue their efforts to strengthen the integrity regime applicable to political officeholders. Meanwhile, the second part of the recommendation is partly implemented.

28. GRECO concludes that recommendation iii has been partly implemented.

Recommendation iv

29. *GRECO recommended developing efficient internal mechanisms to promote and raise awareness of integrity matters in the Government, including confidential counselling and training at regular intervals of persons entrusted with top executive functions.*

30. The authorities explain that a training programme for staff of offices of direct collaboration has been integrated into the three-year planning cycle of the Presidency of the Council of Ministers. As part thereof, an in-house training day (25 June 2025) was organised on "Ethics, Integrity and Responsibility within the Presidency of the Council of Ministers", as well as three editions of the National School of Administration course

dedicated to behavioural and disciplinary profiles (October-November 2025) – explicitly addressed also to personnel serving in offices of direct collaboration – in addition to e-learning modules on whistleblowing and specific sessions on privacy and publication obligations. The PIAO 2026 confirms the continuation and strengthening of these initiatives, planned by the Department for Personnel in cooperation with the RPCT, with mandatory and optional courses differentiated according to risk profile.

31. As regards counselling, the RPCT of the Presidency of the Council of Ministers now performs structured and permanent support functions. In 2025, an updated operational Vademecum was prepared concerning declarations of financial interests and conflicts of interest, including specific guidance on the persons concerned, as well as on the methods and timing for completing such declarations. The RPCT also publishes a newsletter on the intranet network containing periodic updates on corruption prevention and transparency, manages the whistleblowing channel through a dedicated IT platform, and provides operational guidance to structures through circular notes. Taken together, these tools establish a permanent and accessible advisory mechanism responding to the guidance and support function in the management of ethical dilemmas required by the recommendation.

32. GRECO welcomes the information provided as regards regular and ongoing training activities targeting specifically personnel of the offices of direct collaboration. It does not seem, however, that any training activities are currently provided to ministers and other political officeholders. As regards confidential counselling, the activities undertaken by the RPCT are meaningful from an awareness-raising standpoint. That said, no reference is made to the possibility for PTEFs – both ministers and staff of the offices of direct collaboration – to obtain, upon request, confidential one-on-one advice on their specific situation or questions.

33. GRECO concludes that recommendation iv has been partly implemented.

Recommendation v

34. *GRECO recommended that an appropriate level of general public consultation on Government draft legislation be effectively ensured and that only specific and limited exceptions to this rule made possible and clearly regulated.*

35. The authorities report that Italy has enhanced its infrastructure for public consultation via the ParteciPa platform, built upon open-source Decidim software and serving as a centralised hub for consultation initiatives, notably strengthened by National Action Plans for Open Government. Between 2022 and 2023, 10 pilot open government projects tested participatory practices, reinforcing operational models to foster policy co-design, reduce fragmentation, and cultivate a culture of listening and participation. The 6th National Action Plan for Open Government 2024–2026 (6NAP), adopted in July 2024 after an extensive co-creation process, marks a significant advancement. Guided by four objectives—diffusing open Government, strengthening transparency and open data, promoting integrity, and combating inequalities, the 6NAP aims to mainstream open Government policies into national development.

36. Operationally, the period 2024–2026 saw a significant uptick in consultations, with 24 held via ParteciPa across various ministries and agencies, each referenced to specific legislative acts and digital identity access (SPID/CIE/CNS). Notable consultations included topics like taxation, public sector ethics, environmental incentives, infrastructure, administrative simplification, and AI adoption. The participatory architecture of 6NAP extends across all objectives, notably resulting in new transparency guidelines, a model centered on public value, and the imminent adoption of national guidelines on public participation—already subjected to participatory workshops and public consultations, aligning with European Commission Recommendation (EU) 2023/2836 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes, and scheduled for completion by May 2026. Training initiatives delivered through the Syllabus platform have played a pivotal role in institutionalising participatory democracy within Italy's public administration. Over 430,000 courses on open Government practices have been completed—predominantly by personnel from non-central public entities—thereby embedding a culture of openness and civic engagement across the country's administrative structure.

37. GRECO welcomes the adoption of the 6th National Action Plan for Open Government 2024–2026 and the comprehensive measures implemented to foster civic engagement and public participation. The upcoming adoption of national guidelines on public participation also seems promising in that regard. GRECO looks forward to receiving further information on the effect of these measures in its next report.

38. GRECO concludes that recommendation v has been partly implemented.

Recommendation vi

39. *GRECO recommended that (i) rules be introduced on how persons with top executive functions engage in contacts with lobbyists and other third parties who seek to influence the Government's legislative and other activities; and (ii) sufficient information about the purpose of these contacts be disclosed, such as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion.*

40. The authorities explain that, on 29 January 2026, the Chamber of Deputies approved in first reading a Parliamentary bill (A.C. 2336) on "Regulation of institutional relations activity for the representation of interests". The bill is currently under examination by the Senate (A.S. 1780). The bill establishes a uniform national framework for transparency in institutional relations between interest representatives and public decision-makers and aims to: (a) ensure knowledge of the actors influencing decision-making processes; (b) improve the information base available to decision-makers; (c) promote orderly participation, pluralism and the valorisation of expertise; (d) strengthen integrity and accountability.

41. As regards the first part of the recommendation, public decision-makers are defined broadly, as including members of Parliament, members of the Government (prime minister, ministers, deputy ministers and undersecretaries of state), presidents and

members of independent authorities, and senior officials of public entities. Crucially, heads of offices of direct collaboration are expressly equated with public decision-makers for the purposes of the law. The bill introduces a cooling-off clause prohibiting registration as representatives of interests during the mandate and for one year following the end of national or regional Governmental offices.

42. As regards the second part of the recommendation, the bill introduces a robust transparency system. Each public decision-maker is required to update weekly, in the Register of Interest Representatives maintained by the National Council for Economy and Labour (CNEL), the list of meetings held with interest representatives, specifying the identity of the representative, the place of the meeting and the subject matter discussed. Within 45 days, the public decision-maker must provide a summary of the matters discussed and the content of the meeting. All information is published in open-data format in the publicly accessible section of the Register within 20 days of submission. A supervisory committee established within the CNEL is vested with powers to request information, propose sanctions and publish periodic reports. The sanctioning system is graduated and includes warnings, reprimands, suspension for up to one year and removal from the Register, as well as pecuniary sanctions ranging from €1 000 to €5 000 for omissions or inaccurate declarations.

43. Complementing this legislative initiative, the 6th National Action Plan for Open Government 2024-2026 includes among its objectives the adoption of Guidelines on open agendas for public decision-makers, to be completed by 30 June 2026.

44. <u>GRECO</u> welcomes the information reported as regards the approval by the Chamber of Deputies in first reading of Parliamentary bill (A.C. 2336) on "Regulation of institutional relations activity for the representation of interests". The provisions on transparency and disclosure of contacts are especially relevant for the second part of the recommendation, which is now partly implemented. GRECO acknowledges that the bill also contains some rules on contacts of PTEFs – including the prime minister and ministers – and lobbyists. These rules focus mostly on disclosure of contacts but also introduce a cooling-off period during which PTEFs may not register as lobbyists, thereby going some way towards implementing the first part of the recommendation. The supervision and enforcement aspects of the bill are positive as well.

45. <u>GRECO concludes that recommendation vi has been partly implemented.</u>

Recommendation vii

46. *GRECO recommended that (i) clear and comprehensive provisions and guidance be introduced for persons with top executive functions in order to prevent and resolve (potential) conflicts of interest and (ii) a requirement of ad hoc disclosure be introduced in respect of persons exercising top executive functions in situations of conflict between their private interests and official functions as they arise.*

47. <u>The authorities</u> report that, as regards the second part of the recommendation, article 9 of the PCM Code of Conduct (Prime Ministerial Decree of 13 December 2024) requires personnel – including personnel serving in offices of direct collaboration pursuant to

Article 2(1) of the Code – to refrain "from taking decisions or carrying out activities relating to their duties" in situations involving conflicts of interest and to promptly communicate the reasons thereof in writing to the hierarchical superior, the head of the general structure and the department for personnel. such communication is ad hoc – at the very moment when the conflict situation arises or becomes relevant – and the head of the structure promptly decides on recusal and, where appropriate, identifies a substitute.

48. As regards part (i) – clear and comprehensive guidelines – the PIAO 2026–2028 of the Presidency of the Council of Ministers states that, upon assignment to office, all personnel of the Presidency must submit a formal declaration concerning financial interests and conflicts of interest, which is obtained by the responsible manager. Heads of departments and offices report annually to the RPCT regarding the collection of declarations for all assigned personnel. The RPCT, in cooperation with the department for personnel, has prepared standardised declaration forms and an operational Vademecum (2025) containing specific guidance regarding the persons concerned, methods and deadlines for completion. In addition, for 2026 a specific declaration form concerning the absence of conflicts of interest for Single Project Managers (RUPs) will be made available to all structures of the Presidency of the Council of Ministers.

49. The PNA 2025 further strengthened the framework by introducing a general obligation to promptly communicate situations involving potential conflicts of interest to one's manager; for managers, such communication must be addressed to the Secretary-General or Director-General together with the RPCT.

50. <u>GRECO</u> welcomes article 9 of the PCM Code of Conduct, which introduces an obligation to report ad hoc conflicts of interest, as required by the second part of the recommendation. However, this Code only covers personnel of the offices of direct collaboration, and not the political decision-makers themselves (prime minister, ministers, deputy ministers and undersecretaries of state). Part (ii) of the recommendation is, therefore, partly implemented.

51. As regards part (i) of the recommendation, the measures reported focus on declarations of interests for staff of the offices of direct collaboration and on guidance in filling in these declarations. While this guidance is welcome, it does not as such correspond to the aim of this part of the recommendation, which is to consolidate the different rules and regimes of conflicts of interest which, as highlighted in the Evaluation Report, are highly dispersed and heterogeneous. The rules reported do not apply to members of the Government and there is still no guidance provided on how to identify and manage situations in which a minister's or an adviser's interests could influence – or appear to influence – the impartial exercise of their official functions.

52. <u>GRECO concludes that recommendation vii has been partly implemented.</u>

Recommendation viii

53. *GRECO recommended (i) that members of the offices of direct collaboration be allowed to accept or retain paid or unpaid outside positions, occupations, board positions, or*

other paid assignments only after receiving a written authorisation based on a considered determination that the position/activity will not impede ordinary work or raise an issue of conflicts of interest, and (ii) making such authorisations available to the public.

54. The authorities indicate that the PCM Code of Conduct (Prime Ministerial Decree of 13 December 2024) removes the ambiguity identified by GRECO regarding the personal scope of application of the rules on the exercise of accessory activities. The PCM Code of Conduct (Prime Ministerial Decree of 13 December 2024), which is expressly binding upon members of offices of direct collaboration provides, in article 7(2) that "in all cases, employees intending to accept collaborative assignments, including unpaid assignments, shall comply with the legislation governing the granting of extra-institutional assignments", namely article 53 of Legislative Decree No. 165 of 2001, which regulates the authorisation regime. There is therefore no longer any doubt as to the applicability of authorisation rules to this category of personnel. Moreover, the Code of Conduct contains a specific provision dedicated to consultants and collaborators regulating situations of non-eligibility that are also applicable to consultants serving within offices of direct collaboration, "where compatible" (article 23).

55. As regards monitoring, the PIAO of the Presidency of the Council of Ministers established a system of continuous information flows: the department for personnel annually communicates to the RPCT refusals of authorisation requests together with the corresponding reasons, assignments carried out in the absence of the required authorisation (identified through communications relating to remuneration pursuant to article 53(11)), notifications relating to unpaid assignments subject to notification requirements, and paid assignments not subject to the ordinary authorisation regime. This system ensures that information concerning benefits received is systematically transmitted to the RPCT, thereby enabling a structured rather than occasional form of supervision.

56. As regards publication required under part (ii) of the recommendation, the Presidency of the Council of Ministers is implementing – on the basis of ANAC Decisions No. 495/2024 and No. 481 of 3 December 2025 – a restructuring of the "Transparent Administration" section involving standardisation of content in open-data formats, adoption of an ACN-certified platform and annual verification by the Management Board of the Office for the Coordination of Integrity (UCI) concerning compliance with publication obligations.

57. GRECO welcomes the clarification brought by article 7(2) of the PCM Code of Conduct, according to which the rules and restrictions on accessory activities do apply to the personnel of the offices of direct collaboration. The first part of the recommendation is now fully implemented. As to the second part, GRECO takes note of the current restructuring of the "Transparent Administration" section of the Presidency of the Council of Ministers. However, no specific information is provided regarding the current or future publication of the authorisations to carry out secondary activities. This part of the recommendation remains unaddressed.

58. GRECO concludes that recommendation viii has been partly implemented.

Recommendation ix

59. *GRECO recommended ensuring that a full set of rules on gifts and other benefits be applicable to all persons with top executive functions, in the form of appropriate practical guidance, the obligation of reporting gifts and other benefits, and making this information available in a timely manner to the public.*

60. The authorities explain that the PCM Code of Conduct (Prime Ministerial Decree of 13 December 2024) contains provisions relating to gifts and other advantages – which transpose and supplement Article 4 of Presidential Decree No. 62/2013 – and which apply explicitly to all personnel serving in any capacity within the Presidency of the Council of Ministers, including members of offices of direct collaboration of political authorities, as well as consultants, collaborators and economic operators entrusted with public contracts, "where compatible".

61. The system is complemented by a declaration mechanism linking the issue of gifts to the broader regime governing conflicts of interest. Upon assignment to office, personnel of the Presidency of the Council of Ministers submit a formal declaration concerning financial interests and conflicts of interest. In the event of an established conflict – including one arising from the acceptance of gifts or other advantages – personnel are required to abstain and communicate the reasons thereof in writing. Heads of Structures report annually to the RPCT concerning the collection of declarations.

62. The training activities carried out in 2025 – in particular the in-house training day of 25 June and the three editions of the National School of Administration course on ethics and disciplinary profiles, both also addressed to personnel serving in offices of direct collaboration – included the issue of gifts and other advantages as part of integrity training. The whistleblowing system of the Presidency of the Council of Ministers includes among reportable violations conduct contrary to the PCM Code relating to prohibited gifts and advantages, thereby adding a channel for detecting infringements complementary to internal monitoring.

63. The "Transparent Administration" section of the Presidency of the Council of Ministers hosts the PCM Code and related documentation, thereby ensuring the prompt and accessible publication of information required by the recommendation.

64. GRECO welcomes the provisions on gifts and other advantages included in the PCM Code of Conduct, which apply to members of the offices of direct collaboration. It recalls that this Code does not apply to ministers and other holders of political offices. The Evaluation Report had noted, regarding these persons, that the only applicable rules concerned protocol gifts. There was no guidance and reporting obligations regarding gifts or hospitality received in other contexts. Moreover, GRECO notes that information on gifts and hospitality, whether received by ministers or their advisers, is still not published in practice.

65. GRECO concludes that recommendation ix has been partly implemented.

Recommendation x

66. *GRECO recommended that the post-employment regime be strengthened in order to improve its effectiveness and that it be broadened in scope to cover all persons with top executive functions.*

67. The authorities state that the Presidency of the Council of Ministers has established a developed system for implementing the prohibition of "pantouflage" for its employees. First, the Department for Personnel obtains from each employee, upon termination of employment, a specific declaration concerning compliance with the prohibition, the model for which has been updated by the RPCT and is accompanied by an operational Vademecum available on the intranet network. Second, the Presidency of the Council of Ministers has established a "Pantouflage/Revolving Doors" IT database, containing the names of employees who exercised authoritative and/or negotiating powers, together with the private entities subject to such powers. In 2025, a working group was established to define the technical characteristics of a new updated platform, with activities continuing into 2026. This constitutes an infrastructural innovation without precedent in the Italian public administration landscape and enables proactive monitoring of risk situations.

68. The PCM Code (Prime Ministerial Decree of 13 December 2024) includes a specific provision concerning compliance with the prohibition of pantouflage, binding upon all personnel including members of offices of direct collaboration. This resolves the uncertainty identified by GRECO concerning the applicability of the relevant rules to ministerial advisers.

69. The PIAO also provides that the RPCT, in cooperation with the department for personnel, shall collect and systematise the measures safeguarding compliance with the prohibition within a specific guidance act, in accordance with ANAC Guidelines No. 493 of 25 September 2024. This programmatic commitment points towards a structural strengthening of the regime aimed at establishing an organic and uniform system.

70. As regards external oversight, the PNA 2025 referred to ANAC Notification Act No. 3 of 23 July 2025, through which the authority transmitted to the Government and Parliament the critical issues emerging from the existing legislation, highlighting the need for further legislative strengthening, in line with GRECO recommendations.

71. GRECO welcomes the steps taken to improve the effectiveness of the post-employment regime and the clarification of its application to the staff of the offices of direct collaboration. That said, the Evaluation Report highlighted the need for a strengthening of the regime regarding all PTEFs and pointed specifically at the cooling-off period of 12 months applicable for ministers as being too short. GRECO notes that the need for further legislative strengthening has been flagged by ANAC to the Government and the Parliament, and it hopes for further progress in this area.

72. GRECO concludes that recommendation x has been partly implemented.

Recommendation xi

73. *GRECO recommended (i) extending to all persons with top executive functions the duty to declare all their financial interests and ensuring that this information is published in a timely manner; and (ii) considering including financial information on spouses and dependent family members in the declarations for review purposes by the relevant institutions (it being understood that such data would not be made public in the absence of consent by the persons concerned).*

74. The authorities explain that legislation in this area has not changed. That said, the Presidency of the Council of Ministers has strengthened its operational model, according to guidance provided by ANAC Decision No. 241 of 2017. Upon assignment to office, all personnel – including members of offices of direct collaboration – submit to the responsible manager a formal declaration concerning financial interests and conflicts of interest. Managers carry out checks whenever there is reasonable suspicion of inaccuracy or where reports are received from third parties. Heads of departments and/or offices of the Presidency of the Council of Ministers report annually to the RPCT regarding the collection of declarations for all assigned personnel. The RPCT has prepared standardised forms and an operational Vademecum (2025) containing specific guidance. With regard to declarations concerning non-eligibility and/or incompatibility of managerial appointments, the department for personnel carries out random checks on 10% of declarants, thereby ensuring systematic verification of accuracy of the information provided.

75. As regards Extraordinary Commissioners, declarations concerning the absence of conflicts of interest are obtained at the time of appointment with reference included in the appointment decree, thereby extending coverage to a category of PTEFs not mentioned in the Evaluation Report.

76. Declarations concerning non-eligibility and/or incompatibility of managerial appointments are published in the "Transparent Administration" section under a structured governance system: publication obligations simultaneous with the appointment act, certification by the Management Board of the UCI where the matter falls within those annually identified by ANAC for verification, operational guidance by the RPCT, and an ongoing restructuring process based on ANAC Decisions No. 495/2024 and No. 481/2025. During the period 2026-2028, the entire declaration system is to be digitalised, thereby increasing accessibility and verifiability.

77. As regards part (ii) of the recommendation – inclusion of family members – the Italian legal framework already provides that the grounds for incompatibility pursuant to Legislative Decree No. 39/2013 (Article 10(2)) extend to spouses and relatives up to the second degree. Law No. 215/2004 similarly provides for declaration obligations extending to non-separated spouses and relatives up to the second degree, transmitted confidentially to the Competition Authority (AGCM) solely for verification purposes – without publication in the absence of the consent of the persons concerned. This approach responds to the wording of the recommendation, which specified that the data should not be "made public without the consent of the persons concerned".

78. With regard to the first part of the recommendation, GRECO notes that the legal disclosure regime applicable to PTEFs has not changed. While it is positive that the Presidency of the Council of Ministers has strengthened its operational model in accordance with ANAC guidelines, the scope of declarations has not been modified. Regarding the second part of the recommendation, the information provided does not enable GRECO to conclude that proper consideration has been given to the recommendation. It had already noted in the Evaluation Report that spouses and relatives up to the second degree of government members were covered by the public disclosure system – unless they refused, which appeared to be the case for 40% to 50% of ministers' relatives.

79. GRECO concludes that recommendation xi has not been implemented.

Recommendation xii

80. *GRECO recommended that all declarations submitted by persons entrusted with top executive functions be subject to substantive verifications.*

81. The authorities indicate that the system of substantive checks has undergone significant transformation. The PIAO of the Presidency of the Council of Ministers documents a multi-level control architecture going well beyond mere formal verification. At the appointment stage, the proposing structures obtain complete declarations and carry out the relevant checks. Following appointment, the department for personnel performs random checks on 10% of declarants and reports annually to the RPCT, limited to situations involving non-eligibility and incompatibility concerning managerial appointments. Managers of the relevant structures obtain declarations concerning financial interests and conflicts of interest and conduct checks where appropriate in cases of reasonable suspicion or third-party reports. Heads of departments and/or offices of the Presidency of the Council of Ministers report annually to the RPCT, thereby ensuring a structured flow of information. The two-tier monitoring system – annual self-assessment by heads of departments and/or offices by 15 November and verification by the RPCT assisted by internal control bodies – ensures that substantive checks are integrated into a continuous accountability cycle.

82. A particularly significant feature is the attribution to the RPCT of the Presidency of the Council of Ministers of sanctioning powers – established as an institutional function in accordance with Article 15 of Legislative Decree No. 39 of 2013 and the "Guidelines on the assessment of non-eligibility and incompatibility of administrative appointments by the Anti-Corruption Prevention Officer", adopted by ANAC Decision No. 833 of 3 August 2016 – for the purpose of establishing individual liability in matters of non-eligibility and incompatibility. This provision ensures that substantive checks do not remain exercises devoid of consequences in case irregularities are detected.

83. At the national strategy level, the PNA 2025 introduced specific objectives: Objective 4.1 provides for ANAC random checks on different categories of entities with progressive annual targets; Objective 4.2 provides for strengthening random checks on 5% of appointments granted during each of the years 2026-2028. These are measurable

indicators which, for the first time, make it possible to assess the effectiveness of the control system on a quantitative basis.

84. GRECO takes notes of the information provided. Some measures may potentially bring future improvements to the effectiveness of the control system, such as the inclusion of measurable indicators for random checks on appointments in the PNA 2025. It is, however, too early for GRECO to assess whether this is the case. Overall, the review mechanisms for the control of asset declarations have not changed. The dual control role of the RPCT and ANAC, in accordance with the 2013 legislative decree and ANAC guidelines of 2016, was already described in the Evaluation Report (see paragraphs 99 and following), as were the RPCT's sanctioning powers. GRECO recalls that the recommendation was given in response to two main gaps identified in the substantive control exercised by the Competition Authority (see paragraphs 113-116 of the Evaluation Report): the Competition Authority's review of government members' real estate and movable property holdings and the lack of controls by that Authority on the declarations of staff in offices of direct collaboration. Nothing in the information submitted indicates that these gaps have been adequately addressed.

85. GRECO concludes that recommendation xii has not been implemented.

Recommendation xiii

86. *GRECO recommended ensuring that the standards set forth for all persons with top executive functions regarding conflicts of interest and non-conferrability/incompatibilities be subject to effective, proportionate and dissuasive sanctions.*

87. The authorities report that the RPCT of the Presidency of the Council of Ministers has sanctioning powers for the purpose of establishing individual liability in matters of non-eligibility and incompatibility. The RPCT challenges the situations identified, ascertains the conditions for exercising sanctioning powers pursuant to Articles 18 and 20(5) of Legislative Decree No. 39/2013, and reports cases involving possible violations to ANAC.

88. For senior managers (heads of units/departments), the PIAO 2025-2027 provides for the obligation to adopt a reasoned decision ordering extraordinary rotation as a precautionary measure in the event of the initiation of criminal or disciplinary proceedings – a deterrent and precautionary measure aimed at safeguarding the impartiality of the administration without awaiting the outcome of the proceedings.

89. The Disciplinary Proceedings Office (UPD) is competent for disciplinary sanctions more severe than a verbal reprimand and is subject to an obligation to report annually to the RPCT. This framework ensures that the sanctioning system is overseen by distinct bodies with complementary competences: the RPCT for matters concerning non-eligibility and incompatibility; the UPD for disciplinary matters; and ANAC for external oversight with investigative, supervisory, and sanctioning powers.

90. As regards members of the Government, the sanctioning system operates on several coordinated levels: the Competition Authority (AGCM) exercises supervisory and

sanctioning powers pursuant to Law No. 215/2004, including warnings, preventive measures and proposals for removal from office; criminal offences against public administration apply at the criminal level; and the Court of Auditors is competent for administrative and accounting liability.

91. GRECO takes notes of the information provided. Although the authorities report a multi-tiered system of accountability for members of the Government in the event of a breach of their disclosure obligations, no changes to the relevant legal framework, which was assessed by GRECO as insufficient in the Evaluation Report, are reported. As for members of the offices of direct collaboration, according to the PCM Code of Conduct, they are now subject to the same disciplinary rules as those applicable to staff serving in the Office of the Prime Minister. This is a positive change.

92. GRECO concludes that recommendation xiii has been partly implemented.

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xiv

93. *GRECO recommended that further efforts be made to promote a more balanced representation of genders in all ranks of the law enforcement authorities as part of recruitment and internal career moves.*

94. The authorities provide an overview of the steps taken to comply with the recommendation across the three law enforcement agencies. In the *Guardia di Finanza*, reference is made to various measures to promote gender equality, eliminating previous exclusion and restrictions on women's recruitment, and ensuring equal access and career opportunities. These goals were advanced through Law No. 380 of 20 October 1999 ("Delegation to the Government for the establishment of voluntary military service for women") and Legislative Decree No. 24 of 31 January 2000 ("Provisions on voluntary recruitment, legal status and advancement of female military personnel in the Armed Forces and the Guardia di Finanza"), which lifted the ban on women's enlistment in military law enforcement. Ministerial Decree of 12 January 2006 further removed recruitment quotas for women and adopted different physical test criteria for men and women (other than for special roles) to prevent discrimination. Following these reforms, women now serve in all operational roles, and female enlistment has grown from 3.34% to 9.85% between 2015 and 2024. The success rate for female applicants is consistent with the percentage of women applying. Career advancement and promotions are governed without gender distinction, as set out by Decree-Law No. 69/2001.

95. As regards the *Carabinieri*, a recent study confirms progressive gender integration in line with the Military Code (Legislative Decree No. 66/2010). Female representation continues to grow, although women numbers remain lower than men due to the staggered introduction of access for various ranks (Officers since 2000, Inspectors since 2004, Superintendents since 2013, Carabinieri since 2001). The rate of female promotions over the past five years matches that of men.

96. Finally, as regards the *State Police*, the authorities cite recent recruitment data, with 13,230 women among 33,262 applicants for various positions. Promotions are either based on absolute merit (Article 39 of Presidential Decree No. 1077/1970) or comparative merit, as determined every three years by the State Police's Board of Administration for personnel. As of 1 October 2025, 281 women hold top management positions.

97. GRECO welcomes the encouraging trends towards a steady improvement of the gender balance across all ranks of the three law enforcement agencies. Within the *Guardia di Finanza*, the proportion of female staff has steadily increased from 3.34% in 2017 to 9.85% in 2024. Notably, women now make up 25% of current cadets in training, despite most applications still coming from men. As of April 2025, women hold 15.6% of managerial (officer and warrant officer) positions, up from 13.93% reported previously. A woman was recently promoted to the rank of colonel. For the *Carabinieri*, data show female enlistment rose from 20.77% in 2021 to 27.73% in 2024, reflecting effective gender integration in line with the Military Code. The rate of female promotions over the last five years matches that of their male counterparts. The *State Police* also report progress, with women accounting for about 40% of applications in the latest recruitment competition. There is significant female representation, including in managerial positions. In view of this meaningful progress, GRECO takes the view that the recommendation may be considered as dealt with in a satisfactory manner by all three forces.

98. GRECO concludes that recommendation xiv has been dealt with in a satisfactory manner.

Recommendation xv

99. *GRECO recommended (i) that a code of conduct for the State Police be adopted and published, with concrete examples and explanations regarding the conduct expected of police officers and (ii) that it be accompanied by effective oversight and enforcement.*

100. The authorities indicate that art. 9 of the Service Regulations of the Public Security Administration, decree of the President of the Republic 28 October 1985 n. 782, provides for the possibility for State Police personnel to submit reports of corrupt events to higher bodies without fear of repercussions.

101. GRECO notes that no tangible measures have been adopted to implement the recommendations. It recalls the critical issues highlighted in the Evaluation Report (see paragraphs 181-182) and reiterates that while binding rules are contained in the service and the disciplinary regulations, they lack the illustrative and educational value that a dedicated code of conduct can bring.

102. GRECO concludes that recommendation xv has not been implemented.

Recommendation xvi

103. *GRECO recommended that the ethical principles and rules of conduct applicable to staff of the Carabinieri and the Guardia di Finanza be complemented with a manual containing practical guidance and examples that takes into account each force's specificity, variety of duties and vulnerabilities.*

104. The authorities report that, on December 23, 2025, the *Guardia di Finanza* adopted a new Code of Ethics and launched an interactive intranet database to guide staff on ethical issues. This tool compiles anonymised cases from confidential consultations, disciplinary actions, and corruption risk assessments, as highlighted in the Three-Year Anti-Corruption Plan. Article 17 of the Code, "Interpretative doubts and ethical issues," establishes:

- A direct channel (questionietiche@gdf.it) for staff to submit questions about the Code, available exclusively through the internal network.
- A database of practical examples and guidance, sorted by sector (operations', 'personnel', 'logistics and administration', 'social media and IT tools', and 'other'), including cases submitted via email.

105. To ensure widespread understanding, the Guardia di Finanza publishes and emails Code materials to all staff, provides targeted training on ethics and integrity, and offers regular updates.

106. For the *Carabinieri*, the authorities report that the drafting of a Code of Ethics ("Ethics and integrity") is underway per the Commanding General's policy guidelines. Developed by the Office of Legal Affairs and Military Conditions, the Code will serve as both a legal and ethical framework, including legislative references and five annexes with practical examples tailored to different roles and vulnerabilities. These topics will be extensively covered in both introductory and ongoing training for all personnel.

107. GRECO welcomes the adoption of a revised version of the Code of conduct of the *Guardia di Finanza*. It is worth noting that the preamble to the code explicitly acknowledges that the update of the text took into account not only regulatory changes and technological developments but also the recommendations made by GRECO. GRECO also welcomes the innovative modalities adopted to provide practical guidance, namely the establishment of a database of practical examples and of a direct channel on the intranet, through which all staff members can submit questions regarding ethical issues. The recommendation is, therefore, fully implemented by the Guardia di Finanza.

108. With regard to the *Carabinieri*, GRECO welcomes the ongoing process towards the adoption of a new code of ethics. It also welcomes the annexes that provide explanatory guidance pertinent to the different areas of intervention and seem to meet the requirements of the recommendation. Pending the adoption of these documents, the recommendation is partly implemented by the Carabinieri.

109. GRECO concludes that recommendation xvi has been partly implemented.

Recommendation xvii

110. *GRECO recommended (i) that mechanisms be introduced for providing confidential counselling on ethical and integrity matters for staff of the law enforcement authorities; and (ii) developing databases of the topics addressed by these mechanisms, that are made available for their staff as a whole.*

111. The authorities refer, with regard to the *Guardia di Finanza*, to the two new digital tools established by the new Code of Conduct (see paragraph 104 above). The dedicated e-mail channel is managed by the Headquarters Department, which assists the Corruption Prevention and Transparency Officer. For consistent responses, queries may be referred—anonymously—to other General Staff departments. The interactive database compiles anonymised guidance from ethical support cases, criminal or disciplinary proceedings, and anti-corruption activities, as outlined in the Three-Year Anti-Corruption Plan. It is searchable by text, topic or key words.

112. Regarding the *Carabinieri*, a new ethical consultancy mechanism has been launched using the existing "URP Box" system, located with the Public Relations Office of the General Command, allowing personnel at all levels to anonymously submit questions on ethics or integrity. The URP forwards these anonymised questions to the Office of Legal Affairs and Military Conditions, which consults with ethics instructors and other relevant units to draft responses. Follow-up with an ethics officer may be recommended for sensitive cases. Additionally, a new intranet "Ethics and Integrity" FAQ section—drawing on the GRECO "Commentary on the European Code of Ethics for Police Forces" and the Carabinieri's own guidelines—will collect and regularly update responses to common ethical questions.

113. GRECO welcomes the arrangements put in place by the Guardia di Finanza and the Carabinieri to provide confidential advice on ethical issues and develop databases of the topics addressed. While not fully operational yet, these tools appear to fulfil the requirements of both elements of the recommendation. The recommendation is, therefore, fulfilled by the Guardia di Finanza and the Carabinieri. However, the recommendation is also addressed to the State Police, in which no tangible measure towards implementation is reported. This recommendation remains unimplemented as regards the State Police.

114. GRECO concludes that recommendation xvii has been partly implemented.

Recommendation xviii

115. *GRECO recommended that integrity checks be carried out in the context of changes of positions and promotion and, for the most exposed functions, at regular intervals in the course of law enforcement officers' career.*

116. The authorities first note that the *Guardia di Finanza* has implemented comprehensive measures for integrity checks throughout personnel's careers. Primary regulations concern extra-professional activities: all such activities, even if unpaid, must be reported in advance to superiors and/or authorised under Internal Document No. 200000 (last

updated June 24, 2025) on "Incompatibility rules. Regulations and requirements regarding extra-professional activities." In addition to incompatibility provisions, all officers must annually submit detailed deployment plans disclosing personal status (e.g., marital and family relationships up to the second degree direct and fourth degree collateral) as well as any cohabitation or professional affiliations with individuals in industry, commerce, private organisations, or other relevant circumstances.

117. Using this information, hierarchical authorities assess possible risks or unfitness, as indicated in the planning sheets or through other disclosures, and promptly reassign duties within the office as necessary. If reassignment requires a transfer outside their authority, proposals are forwarded to Headquarters. Internal regulations also set employment criteria and rotation policies to prevent territorial entrenchment. Annually, a comprehensive review is conducted to identify any new risks. Additionally, most officers (7,940) are required to obtain Security Clearance due to the sensitive nature of their roles; both issuance and renewal include thorough background checks—covering financial status of the applicant and associates—to ensure only those of impeccable integrity access classified material.

118. Regarding the *Carabinieri*, the authorities reference the NOS ("Nulla Osta di Sicurezza") or security clearance regulations— that apply to 73% of officers similar to those of the Guardia di Finanza—and the personnel mobility system. Notably, officers' first assignment must differ from their home post, where they are required to serve at least eight years. There is also a prohibition (art. 238, Presidential Decree 90/2010) on assigning personnel to locations with objective environmental incompatibilities that could compromise impartiality and the institution's reputation. Furthermore, based on a corruption risk mapping, an ordinary five-year rotation system applies to 854 high-risk positions, as assessed per Annex 1 of the 2019 National Anti-Corruption Plan.

119. For the *State Police*, the authorities state that, upon assignment—especially to sensitive functions—all agents and officers must declare the absence of grounds for ineligibility or incompatibility, pursuant to Legislative Decree No. 39 of 8 April 2013.

120. <u>GRECO</u> takes note of the explanations provided by the Guardia di Finanza and the Carabinieri. These explanations show that, although no new measure has apparently been taken to implement the recommendation, effective integrity checks are in place throughout the career of officers. These include annual declarations of personal and professional circumstances, regular assessment and management of incompatibilities and conflicts of interest, staff rotation, assignment restrictions, rigorous security clearance requirements, and comprehensive annual reviews. Consequently, the Guardia di Finanza and the Carabinieri have dealt with the recommendation in a satisfactory manner. This is not the case for the State Police, which only refers to a general provision on incompatibility dating back to 2013. The recommendation remains not implemented in respect of this force.

121. <u>GRECO concludes that recommendation xviii has been partly implemented.</u>

Recommendation xix

122. *GRECO recommended conducting dedicated training and awareness-raising activities on a regular basis about whistleblower protection measures for all levels of hierarchy and chains of command in the law enforcement authorities.*

123. The authorities report, regarding the *Guardia di Finanza*, that specific training on whistleblower protection has been integrated into the 2025 Training Plan, notably through two e-learning courses: "The Three-Year Plan for the Prevention of Corruption and Transparency – Ethics and Legality" (for 5,000 servicemen) and "Risk Analysis and Management in the Corruption Prevention System" (for 250 servicemen). In line with the recommendation, the first course is now part of the 5th-year curriculum at the Academy for future managers and executives, and the 3rd-year curriculum at the Inspectors and Superintendents School for future middle managers. Additionally, an annual in-depth study on whistleblower protection, conducted as part of the Three-Year Plan for the Prevention of Corruption and Transparency, is published on the Corps' intranet homepage and distributed to all personnel by email to ensure broad accessibility.

124. Regarding the *Carabinieri*, the authorities report that the Corps has developed a standard presentation with explanatory notes to facilitate cascade training for lower management levels, as well as a searchable database containing rulings issued on whistleblowing matters organised by keywords to support uniform hierarchical evaluations and decision-making. Both resources are available to all staff and command lines via the internal online portal. Whistleblower protection is included in all basic training courses, with content tailored to the role, and is specifically addressed in the Majors/Lieutenant Colonels course—featuring input from ANAC representatives—as well as in the annual "Fighting Corruption" course at the Higher Institute of Investigative Techniques. The topic is also covered in nationwide seminars by the Support Structure of the Anti-Corruption and Transparency Officer, in refresher courses for command-level personnel, and in meetings with senior management, Legion Commanders, and officers serving in joint Ministry of Defence and Interior forces. Thanks to these tools, training on whistleblower protection measures is currently provided to all military personnel in active service, across all hierarchical levels.

125. Regarding the *State Police*, the authorities report that the fight against corruption is one of the compulsory subjects in the training courses for State Police personnel. In addition to in-person instruction, training is also delivered online through a platform called "SISFOR", which offers specific modules on "techniques to combat corruption" and "corruption reform and crime prescription". In addition, an e-learning module on whistleblower protection is currently being finalised. This module will serve as educational support in upcoming courses at State Police training institutes.

126. GRECO welcomes the information provided by the Guardia di Finanza and the Carabinieri regarding on-going targeted training and awareness-raising on whistleblower protection for personnel at all levels of the hierarchy. The measures taken satisfy the requirements of the recommendation, which is fully implemented by the

Guardia di Finanza and the Carabinieri. As to the State Police, while the ongoing development of an e-learning module on whistleblower protection is positive, it does not appear that any awareness-raising or training activity dealing specifically with this topic has yet taken place. The recommendation remains not implemented in respect of this agency.

127. <u>GRECO concludes that recommendation xix has been partly implemented.</u>

III. <u>CONCLUSIONS</u>

128. **In the light of the foregoing, GRECO concludes that Italy has dealt with one of the nineteen recommendations set out in the Fifth Round Evaluation Report in a satisfactory manner.** Thirteen recommendations have been partly implemented and five have not been implemented.

129. More specifically, recommendation xiv has been dealt with in a satisfactory manner, recommendations iii, iv, v, vi, vii, viii, ix, x, xiii, xvi, xvii, xviii and xix have been partly implemented and recommendations i, ii, xi, xii and xv have not been implemented.

130. With regard to <u>top executive functions</u>, GRECO welcomes that the integrity framework applicable to ministers' advisers has been improved thanks to the adoption of a code of conduct, along with awareness and enforcement measures. The adoption by the Chamber of Deputies in first reading of a Parliamentary bill on lobbying, which intends to introduce more transparency in contacts between persons with top executive functions and lobbyists, is positive as well. Notwithstanding these positive developments, much remains to be done, especially as regards the integrity framework applicable to ministers and state secretaries. Gaps remain as regards, *inter alia*, the need for regular systemic risk analyses, the adoption of a code of conduct with clear guidance and effective supervision, clear rules on conflicts of interests, gifts and outside activities, strengthened and broadened post-employment and financial disclosure regimes, as well as the application of effective and dissuasive sanctions for breaches of integrity standards.

131. Regarding <u>law enforcement agencies</u>, GRECO assesses positively the improvements in the gender balance across all ranks in all three forces. Moreover, it commends the Guardia di Finanza and the Carabinieri for the efforts undertaken to largely implement the recommendations addressed to them. The Guardia di Finanza has notably adopted an updated code of conduct and established innovative tools for ethical support, while the Carabinieri have made substantial progress towards the adoption of a new code of ethics, with tailored guidance, and comprehensive training and integrity measures. In contrast, the State Police have yet to adopt specific tangible measures to address most recommendations, regarding the adoption of a code of conduct along with dedicated mechanisms for confidential counselling, strengthen integrity checks, and offer targeted training on whistleblower protection.

132. In the light of the foregoing, GRECO notes that further progress will need to be made within the next 18 months to achieve an adequate level of compliance with the recommendations. In accordance with Rule 31 revised bis, paragraph 8.2, of its Rules of Procedure, GRECO calls on the head of the delegation of Italy to submit additional information with regard to the implementation of outstanding recommendations, namely recommendations i to xiii and xv to xix, by 31 December 2027.

133. GRECO invites the authorities of Italy to authorise, at their earliest convenience, the publication of this report, and to make a translation of it into the national language available to the public.