

# GRECO: Fifth Round Evaluation Report on Armenia

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## News

On 18 April 2024, GRECO published its [5th round evaluation report on Armenia](#).

The country has been a member of GRECO since 2004. It has been subject to four evaluation rounds with 75% of GRECO recommendations implemented in the joint first and second evaluation rounds, and 100% in the third evaluation round. Regarding the fourth evaluation round, 50% of GRECO's recommendations have been fully implemented and 50% partly implemented. The compliance procedure under that round is ongoing.

Following the 2018 Velvet Revolution, the Armenian Government initiated a reform programme to root out corruption, modernise public governance, decrease the size of the shadow economy, alleviate tax evasion, and tackle monopolies and oligarchies.

Armenia issued an anti-corruption strategy and action plan as well as reformed established/specialised anti-corruption institutions. Anti-corruption measures included a register of beneficial ownership. As a result, Armenia has been among the first countries publishing data online on beneficial ownership; this effort started with an initial focus on extractive industries but has gradually extended to other sectors. From January 2023 on, the requirement to declare beneficial ownership applies to all companies, including those under state ownership.

Large-scale investigations were opened to prosecute high-level corruption and kleptocratic networks connected to previous regimes. Regarding persons with top executive functions (PTEFs), constitutional reforms to change the system of government from a presidential to a parliamentary system came into force in April 2018. The Law on Public Service (LPS), which applies to PTEFs, provides rules on ethics, prevention of corruption, declaration of property, income, interests and expenditures (asset declarations), and mechanisms to implement them. Armenia's new anti-corruption strategy (2023-2026) comprises some measures targeting PTEFs, but they are yet to be developed, including through systematic performance of integrity checks prior to appointment.

GRECO finds the scope of post-employment restrictions, their monitoring, and their enforcement to be the crucial weakness of the system. This is all the more true given the overlap between political and economic interests in Armenia.

Access to information legislation is reasonably comprehensive, but there is no dedicated institutional body, which would ensure systematic and independent review, monitoring, and the promotion of a unified implementation practice. The legislation provides institutional mechanisms to engage civil society and the public at large in the decision-making process, including an electronic platform for public consultations, public

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hearings, and consultative bodies. However, in practice, not all of them are fully functional and effective. The adoption of lobbying rules remains an outstanding matter.

Against this background, GRECO recommends the following in respect of central governments (top executive functions):

- Clarifying and regulating the legal status of unpaid advisors, subjecting them to the highest standards of transparency, accountability, and integrity;
- Carrying out risk analysis covering PTEFs' specific integrity risks on a regular basis, including relevant remedial measures in anti-corruption strategies and action plans;
- Adopting a code of conduct for PTEFs, coupled with credible and effective supervision and enforcement;
- Carrying out an independent impact assessment of the implementation of the legislation regarding access to information, with a particular focus on the use of exceptions, the timeliness of responses, the practice of proactive disclosure, and effective enforcement.
- Compiling and publishing official statistics on information requests and complaints related to refusals and delayed or incomplete responses.
- Considering the establishment of a dedicated independent oversight body for the systematic review, monitoring, and promotion of a unified implementation practice of the freedom of information legislation;
- Ensuring the meaningful participation of civil society, including its engagement in the early stages of decision-making, allowing sufficient time for consultations, and sharing public suggestions to the maximum possible extent;
- Introducing detailed rules and guidance on the interaction of PTEFs with lobbyists and other third parties, who seek to influence the government's legislative and other activities, with sufficient information about the relevant details of these contacts;
- Broadening the time limits and scope of post-employment restrictions in respect of PTEFs and establishing an effective reporting, monitoring, and enforcement mechanism in this regard;
- Providing the Corruption Prevention Commission with adequate financial and personnel resources to effectively perform its tasks with respect to PTEFs.

With regard to corruption among law enforcement authorities, the GRECO report focuses on the police as the primary law enforcement body implementing the government's policy aimed at combating crime and other law infringements, maintaining public order and security. The police are currently undergoing a major structural reform, which started in December 2019. One of the weaknesses in the police is the lack of both a dedicated anti-corruption policy/strategy and a risk assessment. No information is being gathered on whether the current post-employment practices may constitute a vulnerability for the police.

Armenia has a dedicated, rather comprehensive Law on Whistleblowing (last amended in 2022). However, there is still a deeply rooted culture against reporting. Additional action appears necessary to build trust in whistleblower reporting and advisory channels as well as in the available protection measures.

Regarding the police, GRECO therefore recommends the following:

- Taking additional dedicated measures to strengthen the representation of women at all levels;
- Reviewing internal and external media messaging, response times to public queries, and proactive messaging on internal and external matters by the police;
- Publishing information on complaints received, action taken, and sanctions applied against police officers;

- Strengthening the capacity of the staff responsible for communicating to the press and the general public, with the aim of enhancing transparency and public confidence in the police force;
- Adopting a dedicated and operational anti-corruption action plan based on systematic and comprehensive review of risk-prone areas, accompanied by targeted mitigating and control measures and structures (which are subject to regular evaluation and impact assessment);
- Adopting and publishing a code of conduct to address modern challenges of policing that covers all relevant integrity matters in detail;
- Accompanying the code with practical guidance as well as effective awareness-raising and confidential advisory measures;
- Strengthening integrity checks during staff recruitment and systematically carrying out routine vetting during an officers' police career;
- Providing the Internal Security and Anti-Corruption Department of the police with adequate material, financial, and personnel resources to perform its tasks proactively and efficiently;
- Better protecting whistleblower anonymity and further developing internal reporting channels, for example by adopting confidential reporting procedures.

The Armenian authorities are expected to report back to GRECO on the implementation of the 22 recommendations by 30 September 2025. After that, GRECO will again assess the country's level of compliance.

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