

FIFTH EVALUATION ROUND

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

SECOND COMPLIANCE REPORT

MONTENEGRO



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

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 Second Compliance Report assesses the measures taken by the Montenegrin authorities to implement the recommendations made in the [Fifth Round Evaluation Report on Montenegro](#) which was adopted by GRECO at its 91st plenary meeting (13-17 June 2022) and made public on 25 October 2022, following authorisation by Montenegro. The corresponding Compliance Report was adopted by GRECO at its 97th plenary meeting (21 June 2024) and made public on 8 August 2024, following authorisation by Montenegro.
3. As required by GRECO’s Rules of Procedure,¹ the authorities of Montenegro submitted a Situation Report containing information on measures taken to implement the recommendations in the Evaluation Report. That report was received on 16 January 2026 and, along with the additional information provided on 21 January and 18 May 2026, served as a basis for this Compliance Report.
4. GRECO selected Lithuania (in respect of top executive functions in central governments) and North Macedonia (in respect of law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Jolanta BERNOTAITE on behalf of Lithuania, and Mr Vladimir GEORGIEV on behalf of North Macedonia. They were assisted by GRECO’s Secretariat in drawing up this report.

II. ANALYSIS

5. GRECO addressed 22 recommendations to Montenegro in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendations ii, xiv and xv had been implemented satisfactorily, recommendations iii to vii, x to xii, xvi, xvii and xxii had been partly implemented and recommendations i, viii, ix, xiii and xviii to xxi had not been implemented. Compliance with these recommendations is dealt with below.

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

Recommendation i

6. *GRECO recommended laying down rules requiring that that integrity checks take place prior to the appointment of ministers and state secretaries in order to identify and manage possible risks of conflicts of interest before their appointment.*
7. GRECO recalls that this recommendation was not implemented in the Compliance Report. GRECO noted that the draft Law on the Government would address the

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.

introduction of integrity checks for PTEFs prior to their appointment. However, the draft was at an early stage and at that time.

8. The Montenegrin authorities now report that the implementation of this recommendation remains contingent on the adoption of the Law on the Government, which, *inter alia*, stipulates integrity checks prior to the appointment of ministers and state secretaries.² The authorities provide detailed information regarding the different stages of development of this draft Law, which included public and inter-ministerial consultations, gathering of opinions from the European Commission for Democracy through Law,³ the European Commission, as well as a roundtable to present the finalised draft to the public. According to the authorities, on 19 February 2026 the draft has been approved by the Government and is currently being examined by Parliament. The relevant secondary legislation is intended to be adopted upon the entry into force of the Law on the Government. Furthermore, the authorities submit that following the amendments to the Law on State Civil Servants and Employees adopted in July 2025, further anti-corruption safeguards and mandatory integrity checks have been introduced to be applied in the process of appointment of Chief of Staff and Deputy Chief of Staff, as well as special advisors to the Prime Minister and Deputy Prime Ministers.⁴
9. GRECO notes with satisfaction that Chapter X of the draft Law on the Government, entitled “Integrity check” contains three Articles (43 to 45) setting out the requirement for candidates to the office of the Prime Minister, deputy Prime Minister and other senior government offices to undergo integrity checks prior to being proposed for appointment. These articles also spell out the modalities of conducting these integrity checks, the authorities responsible for verifying the responses to relevant questionnaires to be filled in by candidates, and the verification procedure. Even though the draft does not specify any consequences in case of not passing the integrity check, GRECO recalls that the main objective of this recommendation is enabling the identification of possible conflicts of interest or such risks in respect of persons contemplated for such posts and to manage them ahead of their appointment. The adoption of the draft Law on the Government with the current wording of Chapter X

² More specifically, the draft Law on the Government provides that prior to proposing candidates for Prime Minister, members of the Government, and senior executive branch officials an integrity check shall be conducted to identify and manage potential risks of conflict of interest, involving the authorities responsible for public procurement, tax collection, as well as the Agency for Prevention of Corruption (ASK).

³ The Follow-up Opinion to the Opinion on the Draft Law on the Government, Adopted by the Venice Commission at its 143rd Plenary Session (13-14 June 2025) is available via the following link: [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2025\)030-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2025)030-e)

⁴ In particular, a person cannot be appointed to these positions if they:

- have been convicted by a final judgment for a criminal offense that renders them unworthy of performing a public office;
- have been dismissed, suspended, or subjected to a disciplinary measure in the last three years for violating laws governing the prevention of corruption;
- have been found in violation of provisions regarding illicit donations to political entities and election campaigns;
- have engaged in unlawful lobbying in the last three years;
- have been registered in the Lobbyist Register in the last year, in accordance with the law governing lobbying.

would meet the requirements of this recommendation. Therefore, GRECO encourages the Montenegrin authorities to complete the remaining steps for its adoption.

10. GRECO concludes that recommendation i has been partly implemented.

Recommendation iii

11. *GRECO recommended that clear role and missions be assigned to the National Council for Fighting Corruption so as to ensure the consistency of the overall strategy for preventing and fighting corruption.*

12. It is recalled this recommendation was partly implemented in the Compliance Report. GRECO noted that the National Council for the Fight Against Corruption had been established and its tasks specified, but the modalities of its interaction with other anti-corruption state bodies, in particular the Agency for Prevention of Corruption (ASK), and how the consistency of the overall anti-corruption strategy was ensured remained unclear.

13. The authorities now report that, following the adoption of the Anti-Corruption Strategy 2024–2028 and its Action Plan, additional measures have further defined the role and functioning of the National Council for the Fight Against Corruption. The amendments adopted in December 2024 to the Decision on the Establishment of the National Council clarified its composition (President, Deputy President and 23 members)⁵ and strengthened its mandate as the central policy coordination and oversight body for corruption prevention. Further, the authorities report that in September 2025, a Memorandum of Cooperation was signed between the National Council and the ASK, formalising regular coordination, information exchange, and collaboration in the area of risk assessment and mechanisms for practical and routine cooperation.⁶ The

⁵ Article 3 stipulates that the President of the National Council is the Vice President of the Government for Political System, Justice and Anti-corruption, while the Deputy President of the Council is the Minister of Justice. The members of the Council are: the Deputy Prime Minister for Infrastructure and Regional Development; Minister of Internal Affairs; Minister of Finance; Minister of Public Administration; Minister of Ecology, Sustainable Development and Development of the North; Minister of Sports and Youth; Minister of Energy; Minister of Diaspora; Minister without Portfolio; Director of the ASK; Director of the National Security Agency; Director of the Tax Administration; Director of the Customs Administration; Director of Forestry and Hunting Grounds Management; Supreme State Prosecutor; Chief Special Prosecutor; President of the Supreme Court; President and Vice-President of the Council of the ASK; representative of the Community of Municipalities; representative of the Montenegrin Academy of Sciences and Arts; two representatives of the non-governmental sector, elected in accordance with the regulation establishing the criteria and procedure for the selection of representatives of non-governmental organisations in working groups and other working bodies formed by ministries and administrative bodies.

⁶ The Memorandum sets out cooperation in areas such as joint strategic planning, information exchange, identification and elimination of sectoral and individual corruption risks, and monitoring and evaluation of anti-corruption measures. The Memorandum envisages the appointment of contact persons in both bodies, participation in joint meetings, working groups, and workshops, as well as regular mutual reporting and sharing of analyses and recommendations, including those gathered from civil society. The ASK undertakes to provide professional and confidential advisory support to the National Council on conflicts of interest, integrity and ethics rules, and the development of internal procedures, guidelines, and methodological tools. The Memorandum also foresees joint risk assessments, expert activities, and the exchange of international best practices.

authorities report that the National Council and its Operational Team conducted several meetings and contributed to specific anti-corruption activities carried out by the ASK and other relevant bodies.⁷

14. GRECO notes with satisfaction that the Memorandum of Cooperation concluded between the National Council for the Fight against Corruption and the ASK in September 2025 establishes the modalities of interaction between these two bodies and provides for a comprehensive framework for cooperation. Moreover, GRECO also notes that the composition and mission of the National Council have been reviewed in a holistic manner, bearing in mind the roles of other anti-corruption bodies in the implementation of the Anti-Corruption Strategy for 2024-2028, as manifested by the recent work of the National Council, and its participation in various anti-corruption activities conducted by the ASK and other bodies. It follows that the requirements of this recommendation have been complied with.
15. GRECO concludes that recommendation iii has been implemented satisfactorily.

Recommendation iv

16. *GRECO recommended that a coordinated strategy for preventing corruption amongst persons entrusted with top executive functions (PTEFs) be adopted on the basis of risk assessments and that it be made public.*
17. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO noted that preparatory work had been carried out on developing a national anti-corruption strategy, including the setting up of a working group and the finalisation of a draft. However, the draft strategy did not address preventing corruption amongst PTEFs as a priority area, and the strategy itself was not adopted at that time.
18. The authorities now report that, following the adoption of the Anti-Corruption Strategy 2024–2028 on 4 June 2024, and its accompanying Action Plan, an Annex to the Strategy has been introduced, designating PTEFs as a seventh priority area for corruption prevention. In particular, the Annex introduces measures for the integrity, accountability, and transparency of PTEFs, with the aim of strengthening preventive mechanisms and institutional controls with regard to the top executive government positions. The authorities submit that the ongoing systematic mapping and monitoring of risks affecting PTEFs are carried out by means of integrity plans⁸ and annual

⁷ More specifically, by the end of 2025, the National Council held 10 sessions, along with 18 regular and seven thematic sessions of its Operational Team. The National Council has sought the ASK opinions on several regulations and on situations of possible corruption risks in matters of public interest. In May 2025, the National Council adopted a comprehensive Action Plan for monitoring the implementation of the recommendations of the UNCAC and GRECO, prepared by the ASK in consultation with other institutions, thereby creating a unified framework linking national strategy, international obligations, and institutional oversight. In October 2025, the National Council supported a nationwide campaign entitled “Montenegro free from Corruption”, launched by the ASK and targeting high-risk areas such as health care, education, border and customs operations, and local services.

⁸ The integrity plans aim to assess job positions, including those of ministers, state secretaries, advisers to the Prime Minister, and other senior officials, for susceptibility to corruption and unethical conduct.

assessments conducted by the ASK, with their results being incorporated into recommendations and preparation of future assessments. In this context, the ASK, in 2024, collected 40 reports on the implementation of integrity plans from various public bodies.⁹ The recommendations issued by the ASK to various state authorities for strengthening the implementation of integrity plans include continued promotion of internal reporting, regular updating of internal rules on conflicts of interest and management of gifts, ensuring the continuity of anti-corruption measures in the event of organisational changes, and making integrity plans and their implementation reports publicly accessible online.¹⁰

19. GRECO welcomes the adoption and publication of the Anti-Corruption Strategy for 2024-2028, and the inclusion of specific measures aimed at PTEFs as its integral part. GRECO notes with satisfaction that the targeted measures of this priority area encompass the vast majority of senior positions in the executive branch¹¹ and that the recommendations issued by the ASK to state administration bodies cover a broad range of areas relevant to preventing corruption and promoting integrity. GRECO encourages the authorities to pursue the implementation of the Anti-Corruption Strategy and the measures aiming at preventing corruption amongst PTEFs, and to keep the public

⁹ The authorities indicate that a total of 1,034 residual risks were identified under the current cycle of integrity plans, with 714 risks (69%) assessed as medium intensity, 214 (21%) as low intensity, and 106 (10%) as high intensity. The largest number of risks was identified in the areas of human resources policy, ethical and professional conduct (249), leadership and management (165), planning and financial management (155), and safeguarding and security of data and documents (97). According to reports submitted in 2024, of all measures planned for risk reduction or elimination, 79.5% were implemented, 11.6% partially implemented, and 8.9% not implemented, showing a 2.2% increase in the rate of successful implementation and a decrease of approximately 1% in the share of measures not implemented, compared to the previous year.

¹⁰ More specifically, the recommendations of the ASK included the following actions and measures:

- promoting internal reporting of unlawful acts, ensuring autonomy and support for whistleblower contact points, relevant training, and protecting those reporting irregularities;
- updating internal rules in line with any amendments to legal and regulatory framework, e.g., on conflicts of interest, gifts, and handling of whistleblower reports;
- maintaining anti-corruption measures and the role of integrity managers in the context of management or organisational changes;
- regularly reviewing corruption risks and reflecting them in the Risk Register;
- ensuring compliance with final decisions of competent authorities and courts, avoiding unnecessary expenditures, and maintaining financial control;
- strengthening supervisory functions over state-owned companies and enterprises;
- assessing risks in asset management, accounting, use, and leasing in line with regulations;
- regularly publishing employee and public official salary lists on the websites;
- improving institutional transparency through regular publication of information and documents;
- publishing integrity plans and implementation reports online or in another appropriate way;
- ensuring that lobbied persons report illicit lobbying to the ASK, submitting all required data and official notes;
- publishing information on lobbying contacts on the websites, as per the Law on Lobbying.

By November 2024, 46 state administration authorities (86.8%) had fulfilled the obligation to publish their integrity plans on their websites.

¹¹ In particular, according to the authorities, the integrity plans for “State Administration” system includes the positions of ministers, administrative bodies and the Secretariats General of the Government, Parliament and the President, state secretaries, advisers to the Prime Minister, Assistant Secretary-General of the Government, Adviser to the Secretary General of the Government, State Agent before the European Court of Human Rights etc.

regularly informed of their outcomes. It follows that this recommendation has been complied with.

20. GRECO concludes that recommendation iv has been implemented satisfactorily.

Recommendation v

21. *GRECO recommended that a review on the overall coherence and effectiveness of the legal framework for preventing and fighting corruption is carried out in order to ensure consistency between existing laws and bylaws, including a law on Government.*
22. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted that a detailed analysis of the Law on Prevention of Corruption had been carried out with support from international partners, and that the process of adopting a new draft law was under way. However, a comprehensive review of the overall coherence and effectiveness of the legal framework for preventing and fighting corruption, which would ensure consistency between existing laws and bylaws, including a law on Government, had not been completed at that time.
23. The authorities now report that the process of amending the Law on Prevention of Corruption has continued, involving inclusive consultations with a broad range of stakeholders and international experts. The authorities specify that, as of December 2025, the draft amendments to the Law on Prevention of Corruption, which have been aligned with the Anti-Corruption Strategy 2024–2028, were submitted to the European Commission for opinion, and the final adoption will follow the receipt of that opinion.¹² In addition, the authorities report legislative steps to strengthen whistleblower protection, notably through a draft Law on Whistleblower Protection, prepared by an inter-institutional working group,¹³ which has been subject to public consultation and an opinion from the European Commission, received in December 2025. The authorities also report other legislative developments relevant to the prevention of corruption, including the adoption of a new Law on the Financing of Political Entities and Election Campaigns and progress on the draft Law on the Government, which remains to be adopted.
24. In addition, the authorities report that a comprehensive review on the overall coherence and effectiveness of Montenegro's legal anti-corruption framework has been finalised on 30 April 2026 by an international expert engaged by the ASK. The review includes the mapping of relevant laws and regulations, institutional mandates, and the rights and duties of PTEFs and civil servants under the LPC and aims at clarifying overlaps, inconsistencies, and institutional responsibilities. The findings of the review

¹² According to the authorities, the draft amendments to the Law on Prevention of Corruption have been further harmonised with the recommendations of an expert, GRECO recommendations as well as the opinion of the European Commission for Democracy through Law (Venice Commission) and have been submitted on 27 April 2026 to the European Commission for final review prior to adoption.

¹³ The Working Group for the drafting of the Law on Whistleblower Protection was established on 27 March 2025 and consisted of representatives of the ASK (two members), the Ministry of Justice, a judge of the Basic Court in Podgorica, and an independent adviser in the Directorate for Criminal and Civil Legislation of the Ministry of Justice.

were submitted to the Secretariat General of the Government, and a guidance resulting from this review has been made public. Further, an inter-agency working group has been set up to further analyse and improve the coherence of the anti-corruption system, mandated to prepare, within three months, recommendations drawing upon the findings of the review, as well as relevant international standards.

25. GRECO takes note of several legislative and policy initiatives, most of which are nearing adoption, aimed at streamlining the legislative framework for preventing and combating corruption, including in the executive branch. The content of draft legislation shared with GRECO, including the amendments to the Law on Prevention of Corruption, the draft Law on the Government, of which the adoption is pending, and the inclusion of corruption prevention among senior government office-holders among the priorities of the Anti-Corruption Strategy for 2024-2028 all go in the right direction. Moreover, GRECO welcomes a recent completion of a review of the anti-corruption legal framework of Montenegro, carried out by an expert commissioned by the ASK, which seeks to analyse the relevant legal provisions, institutional competences and provides recommendations on how to streamline this framework further. In addition, the draft Law on Whistleblower Protection envisages to set out a comprehensive legal and institutional framework in this regard and could usefully complement the overall anti-corruption architecture.¹⁴ While the relevant draft laws have not been adopted yet, GRECO considers that, with the completion of an overview of the anti-corruption legal and institutional framework, the requirements of this recommendation have been complied with. GRECO encourages the authorities to proceed with the adoption of the draft legislation referred to above with no further delay and its effective implementation in practice.
26. GRECO concludes that recommendation v has been implemented satisfactorily.

Recommendation vi

27. *GRECO recommended that i) a code of ethics (Guidelines on ethics) aimed at persons with top executive functions (PTEFs) be established and published, covering relevant integrity matters (e.g. preventing and managing conflicts of interest, contacts with lobbyists and other third parties, handling of confidential information, post-employment restrictions, etc.), ii) complemented with appropriate guidance and concrete examples and iii) coupled with a mechanism of supervision and sanctions.*
28. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted that guidelines for top executive officials had been adopted, albeit still lacking concrete examples, and preliminary work towards a code of ethics for PTEFs was under way, in cooperation with international partners. However, a binding code of ethics for PTEFs, covering relevant integrity matters, accompanied by supervision and sanctions had not been adopted at that time.

¹⁴ The proposal for the Law on Whistleblower Protection, shared with GRECO, contains chapters regulating, *inter alia*, reporting and data protection, internal and external reporting and public disclosure, protection and compensation, reward for reporting irregularities, procedures for reviewing reports etc.

29. The Montenegrin authorities now report that the implementation of this recommendation remains contingent on the adoption of the Law on the Government, which stipulates the adoption of a code of ethics for the senior officials in the executive (Article 18), and outlines a mechanism for its supervision (by an ethics committee, to be established). The authorities indicate that a draft Ethical Code for the President, members of government and senior executive officials has been prepared, and its adoption is envisaged within six months after the entry into force of the Law on the Government. In the meantime, in 2024, the ASK developed and distributed a practical handbook on the prevention of corruption for public officials,¹⁵ including PTEFs, and finalised the guidelines on conflict of interest for public officials.¹⁶ The authorities also inform of targeted training activities and a roundtable meeting with international experts to review and further develop the draft code of ethics.¹⁷
30. GRECO welcomes the additional measures taken by the authorities to strengthen the framework on ethics and integrity for PTEFs, including the development of practical guidance by the ASK, which provides useful support and clarity for those concerned. GRECO further takes note of the update provided regarding the development of a code of ethics for PTEFs, now supported by the draft Law on the Government, both of which remain to be adopted. GRECO encourages the authorities to finalise this process and ensure that the code promotes a positive and supportive understanding of expected standards and is backed by an appropriate supervisory and enforcement mechanism.
31. GRECO concludes that recommendation vi remains partly implemented.

Recommendation vii

32. *GRECO recommended that, in order to ensure its full operational independence, the administrative capacities of the Agency for Prevention of Corruption (ASK) be further strengthened by ensuring independent merit-based recruitment procedures providing for integrity testing of new staff, and to ensure that the number of permanent staff of the ASK is increased to a level that is in accordance with its rules and foreseen workload.*
33. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO noted that some measures to strengthen the independence and staffing of the ASK were in the making or planned, including the development of a checklist for

¹⁵ The handbook entitled “Public Officials and Corruption Prevention – A Practical Handbook”, developed by the ASK in cooperation with the NGO “Centre for Civic Education”, is accessible via the following link (in Montenegrin): https://www.antikorupcija.me/media/documents/Javni_funkcioneri_i_prevenција_korupcije_-_publikacija_final.pdf

¹⁶ Accessible via the following link: <https://www.antikorupcija.me/en/news/2605080548-agency-developed-guidelines-determining-conflict-interest-public-officials/>

¹⁷ On 3 October 2025 in Podgorica, an international anti-corruption expert engaged by the ASK delivered a lecture on anti-corruption topics for PTEFs, which was attended by 27 participants and focussed on key aspects of corruption prevention, such as conflicts of interest, incompatibility of functions and handling of gifts, integrity plans, monitoring of financial flows, confidential counselling, and integrity checks. Further, on 12 December 2025 the authorities conducted a round table entitled “*Enhancing Ethics and Integrity of Holders of the Highest Executive Functions – Presentation of Analysis and Recommendations for Drafting the Ethical Code and the Draft Procedure for Identifying and Managing Conflicts of Interest of Holders of the Highest Executive Functions*”.

integrity testing in recruitment, and a modest increase in staff. However, independent merit-based recruitment procedures, systematic integrity testing for new employees, and full staffing in line with workload requirements had not been achieved yet.

34. The authorities reiterate the provisions governing the funding of the ASK (Article 100 of the Law on Prevention of Corruption, stipulating that the ASK's funding provided from the state budget should be no less than 0.2% of the overall state budget). The authorities further indicate that, since the entry into force of the Law on Prevention of Corruption in June 2024, the rights, obligations and responsibilities of ASK employees are regulated under general labour law, enabling autonomous human resources planning and recruitment. In October 2024, the Council of the ASK adopted a new Rulebook on Internal Organisation, increasing the number of statutory posts from 77 to 98 to meet its operational needs. To ensure merit-based and integrity-tested recruitment as standard practice, the ASK has revamped its recruitment processes, which now include an integrity test with a minimum passing threshold of 80% as a formal, mandatory step. The authorities submit that in the course of 2025, nine new staff members were recruited by the ASK through this process. As of 18 May 2026, the ASK employs 64 staff (54 in October 2021), with further recruitments ongoing. Finally, the authorities report that with a view to ensuring the adequate number of permanent staff members, the ASK Council adopted a Human Resources Management Strategy for 2025–2026, accompanied by a comprehensive capacity assessment and an action plan for professional development.
35. GRECO welcomes the inclusion of integrity tests as a mandatory requirement in the recruitment procedures of the ASK, as well as a notable increase of statutory posts allocated to this body. It would appear that the recruitment of additional staff members continues gradually. Nonetheless, the ASK has not reached its full staffing capacity so far.¹⁸
36. GRECO concludes that recommendation vii remains partly implemented.

Recommendation viii

37. *GRECO recommended that (i) systematic briefing and/or training on legal and ethical integrity standards be provided to persons exercising top executive functions (PTEFs) upon taking office and at regular interval while in office; and that (ii) confidential counselling be provided to all PTEFs for the understanding and the implementation of these standards, and that PTEFs be duly informed of such a possibility.*
38. GRECO recalls that this recommendation was not implemented in the Compliance Report. GRECO noted that while consultations on integrity issues were provided by the

¹⁸ GRECO also refers to the European Commission's 2025 Rule of Law Report, Country Chapter on Montenegro, which states that "*the structural weakness of the ACA in terms of human resources did not improve and the financial independence of the ACA remains to be fully ensured.*" The full text of the 2025 Rule of Law Report on Montenegro is accessible via the following link: https://commission.europa.eu/document/download/4e4b66a5-a08e-4261-a33c-ba083c4d1c08_en?filename=2025%20Rule%20of%20Law%20Report%20-%20Country%20Chapter%20Montenegro.pdf

ASK to integrity managers, the information submitted by the authorities did not demonstrate that systematic briefings or training on ethics and integrity standards for PTEFs were carried out, nor that confidential counselling was available to them.

39. The authorities now report that in September 2025, the ASK has completed an analysis of confidential counselling models for PTEFs, which proposed establishing an ethics committee or a similar confidential counselling mechanism within the executive branch. Following this, on 11 May 2026, the Government adopted a Decision to establish¹⁹ the Integrity Commission as an advisory body to provide confidential advice to PTEFs on matters including conflicts of interest, gifts, and asset and income declarations. The Commission is also mandated to prepare guidelines, identify integrity risks, propose measures to strengthen ethics, transparency, and accountability, conduct training and awareness-raising activities, and report to the Government annually. The Commission is composed of representatives of the Secretariat General of the Government, the Secretariat for Legislation, and the Ministry of Justice, selected from among permanent staff.²⁰
40. In addition, the authorities report that the ASK, in cooperation with UNDP, developed an online training programme entitled “Ethics and Integrity”, covering core topics on ethics, anti-corruption and integrity, including the anti-corruption institutional and legal framework, whistleblower protection and reporting procedures, tailored to public sector employees. The training curriculum consists of four modules addressing personal and systemic aspects of ethics, anti-corruption, code of ethics, and practical guidance on reporting and whistleblower protection. In April 2026, the ASK invited about 110 PTEFs to undertake this training, which by 18 May 2026 has been successfully completed by 87 officials. Further, the authorities refer to the handbook entitled “*Public Officials and Corruption Prevention – A Practical Handbook*” and to the guidelines on conflict of interest (see paragraph 29 above), which has been made public and distributed to PTEFs and other public officials.
41. GRECO notes with satisfaction the recent decision of the Government to set up an Integrity Commission, whose tasks include providing confidential advice on ethics and integrity matters to public officials, including PTEFs. GRECO also notes the additional steps to increase awareness among PTEFs, the dissemination of the practical handbook on corruption prevention, as well as the newly introduced training on ethics and integrity. While GRECO welcomes the good progress made, it considers that the full implementation of this recommendation hinges on the adoption of relevant legislation and regulations (amendments to the Law on Prevention of Corruption, Law on the Government, code of ethics etc.), as well as the newly established Integrity Commission becoming fully operational. Pending this, GRECO views this recommendation as implemented only partly.

¹⁹ The press-release regarding the establishment of the Commission is accessible via the following link: <https://www.gov.me/en/article/government-of-montenegro-establishes-integrity-commission-in-line-with-greco-recommendations>

²⁰ Prospective members of the Commission should have at least a level VII-1 education, three years’ work experience, and at least one year’s experience in anti-corruption tasks.

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

Recommendation ix

43. *GRECO recommended that the legal framework governing access to information and the mechanism of appeal against such decisions be simplified in order to ensure an effective access to government information in practice.*
44. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted that while draft amendments to the Law on Free Access to Information had been submitted to Parliament with the aim of improving access and simplifying appeal mechanisms, the text of these amendments had not yet been adopted, and the practical impact could not be assessed. As a result, effective access to government information, particularly through an efficient system of appeals, remained outstanding.
45. The authorities now report that on 27 December 2025, Parliament adopted the new Law on Free Access to Information,²¹ which introduces a more comprehensive definition of “information” and “authority,” and, for the first time, nuances the concepts of the “harm” test and “overriding public interest” in the context of access to official documents.²² The law also specifies that access to classified information is to be restricted only if it constitutes intelligence and security information, moving away from automatic denial of access. The new Law also requires the central and local government authorities to proactively publish broader categories of information, keep it up to date, and defines a list of public registers and records that should be made available, including in the form of reusable information in open formats.²³ Further, according to the authorities, the new law also abolishes “business secret” as a basis for refusal to provide information.
46. As to appeals, the new legislation strengthens the competences of the Agency for Personal Data Protection and Free Access to Information, including by giving it powers to issue binding opinions and guidelines, exercise overall supervision over the implementation of the Law, and conduct misdemeanour proceedings for violations. A new mechanism is established for “controllers” to supervise application of the Law with the possibility to request and inspect all relevant documents, requesting the authorities to cooperate fully. In addition, the time-limit to examine appeals submitted to the Agency has been extended to 30 days. The authorities also intend to improve the Guide for Access to Information to provide more comprehensive content regarding the scope of information, its availability and updating, both at the local and national level, as well as the manner in which authorised persons are to act to ensure timely processing of requests for information.

²¹ The Law on Free Access to Information has been promulgated on 30 December 2025 and will be applicable as of 8 July 2026.

²² The new Law on Free Access to Information strengthens the concept of “overriding public interest”, especially in cases involving corruption, illegality, or major infrastructure projects. It introduces more restrictive conditions for refusing access to information, requiring the application of the “harm” or “public interest” tests and a substantiation of decisions to withhold information.

²³ In December 2024, the Ministry of Public Administration launched a new Open Data Portal to further promote the re-use of information.

47. Finally, the authorities refer to broader transparency efforts, including the mandatory publication of key procurement documents within the Central Electronic Public Procurement System, providing the public, media, and NGOs with a centralised digital overview of all procurement procedures, documentation, and appeals. The authorities submit that the preparations and discussions of the Law were conducted with broad participations of representatives of civil society, media and experts.
48. GRECO notes the adoption of the new Law on Free Access to Information and its entry into force. An obligation of the authorities to publish official documents on their websites in easy-to-use formats on a broad range of issues of public interest clearly aims at simplifying access to information, which is to be welcomed. GRECO also notes the abolishing the notion of “business secret”, putting in place more stringent provisions regarding the types of information which may be withheld, and an obligation to duly justify refusals to provide information. With regard to strengthening the supervisory role of the Agency for Personal Data Protection and Free Access to Information, GRECO cannot disregard reports putting into question the independence of the Agency, as well as the adequacy of human and financial resources at its disposal.²⁴ One of the key elements of this recommendation relates to the effective appeals mechanism, which does not appear to have been accomplished. It follows that GRECO can consider this recommendation as implemented only partly.
49. GRECO concludes that recommendation ix has been partly implemented.

Recommendation x

50. *GRECO recommended that (i) the definition of lobbying be broadened to cover all such contacts with persons holding top executive functions (PTEFs); that (ii) contacts between lobbyists and PTEFs be disclosed in respect of the identity of the persons involved as well as the subject matters discussed; and that (iii) the Agency for Prevention of Corruption (ASK) be mandated to investigate misgivings in respect of lobbying ex officio.*
51. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted that a comprehensive draft Law on Lobbying had been approved by the Government and was awaiting submission to Parliament. The draft included measures to broaden the definition of lobbying, ensure disclosure and transparency of lobbying contacts with PTEFs, and empower the ASK to investigate lobbying activities *ex officio*. However, the law had not been adopted at that time.
52. The Montenegrin authorities now report that the new Law on Lobbying entered into force on 12 June 2024. Under this law, lobbying activity is extended to cover all bodies of the legislative and executive branches, state administration, independent and regulatory bodies, public institutions, and other legal entities performing public powers or activities of public interest, or in state ownership (Article 2). The law prescribes

²⁴ According to the European Commission’s 2025 Rule of Law Report, the Ministry of Finance significantly reduced the 2025 budget of the Agency, and its Director resigned in December 2024, after less than one year in office.

publication of data on all lobbying contacts, including the names of the lobbyist and the lobbied person, their official position, area and subject of lobbying, the type, date, and location of each lobbying contact (Article 42). The ASK is explicitly mandated to initiate and conduct *ex officio* proceedings to determine whether illicit lobbying or violations of the lobbying law have occurred (Article 48). With regard to any actions aimed at influencing the decision-making, carried out prior to the conclusion of a lobbying contract,²⁵ the authorities indicate that such conduct would constitute illegal lobbying, subject to penalties.²⁶ The authorities report a significant expansion in both the number and types of registered lobbyists, the introduction of enhanced transparency obligations, including proactive publication of lobbying records and accompanying documentation on official websites, and the operationalisation of oversight and enforcement mechanisms by the ASK. However, according to the authorities, since the entry into force of the law, no lobbying activities have been reported so far, whereas contacts with third parties aiming to influence the decision-making are to be reported by the lobbied persons.

53. GRECO notes the adoption and entry into force of the new Law on Lobbying. With regard to the first part of the recommendation, GRECO notes that the new definition of “lobbying” covers *“an activity involving actions aimed at influencing the bodies of legislative and executive power... in the process of adopting laws, other regulations and acts, within the competence of those authorities in order to pursue the interest of a lobbying client, in conformity with law”* (Article 2 of the Law on Lobbying). It also notes that conducting lobbying activities prior to conclusion of the lobbying contract would constitute a violation, punishable by fines and restriction of lobbying activity for three years. Nonetheless, in cases where no lobbying contract is concluded, GRECO considers that differentiating when a contact between a third party and a public official can be considered an attempt to influence the decision-making (or lobbying) and other types of contact could be difficult in practice. This is confirmed by no reported lobbying activities aimed at PTEFs in central government, in spite of the Law being in force since nearly two years and may suggest that some of the *de facto* activities, which may be lobbying activities, continue escaping from the monitoring scope of the ASK.²⁷
54. As regards the second part, GRECO notes that fourth and fifth paragraphs of Article 42 of the Law establish a requirement that the authority in which lobbied person holds an elected, appointed, nominated office, or employment, publishes on their website information on lobbying contacts, in the prescribed form.²⁸ In addition, the government

²⁵ Article 31 of the Law stipulates that *“lobbying shall be conducted based on a written agreement concluded between a lobbyist, i.e. a legal entity engaged in lobbying and the lobbying client, as contracting parties or on the basis of a lobbying order issued to an in-house lobbyist by the lobbying client by which he is employed”*.

²⁶ In particular, in case of illegal lobbying, the Law provides for fines ranging from EUR 500 to EUR 20,000 for a legal entity and from EUR 150 to EUR 2,000 for a natural person (Articles 51 and 52). Further, the Law also provides that lobbyists/lobbying legal entities be deleted from the lobbyist register and prohibited from re-entry into the register for a period of three years.

²⁷ GRECO recalls that this was one of the shortcomings identified in the Fifth Round Evaluation Report on Montenegro (paragraph 79).

²⁸ Notably, name and surname of the lobbyist, name and surname of the person being lobbied, workplace of the person being lobbied, area and subject of lobbying, name and surname, i.e., the name of the lobbying client, type, date and place of lobbying contact.

authority is also required to publish on its website the documents that have been submitted to the lobbied person by the lobbyist. In GRECO's view, these provisions would bring the situation in compliance with the second part of this recommendation, if they were effectively implemented. However, GRECO is concerned that while the Law has been in force since June 2024, not a single report on lobbying targeting PTEFs has been submitted. Therefore, further progress is needed to improve the practical implementation of the disclosure obligation with regard to contacts between lobbyists and PTEFs, including the identity of the persons involved and the subject matters discussed.

55. Finally, with regard to the third part, GRECO notes that the ASK has been granted the powers to initiate procedures to determine whether illegal lobbying has taken place *ex officio*, upon application of a natural person or legal entity, as well as upon a notification of a suspicion of illegal lobbying. GRECO considers that this part of the recommendation has been complied with. Overall, in spite of recognising the good progress made by the authorities in addressing the three components of this recommendation, GRECO can only consider it as partly implemented, as the implementation of the disclosure requirement of all lobbying activities has not been demonstrated in practice.
56. GRECO concludes that recommendation x remains partly implemented.

Recommendation xi

57. *GRECO recommended that the rules on gifts and other advantages be more specific, in particular by clarifying the definition of "protocol and appropriate gifts".*
58. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted some progress in clarifying the legal definition of gifts to public officials and improvements in educational materials on the obligations regarding protocol and appropriate gifts. However, the legal framework, particularly the definitions and procedures relating to protocol and appropriate gifts, still lacked sufficient specificity, and further legislative clarification was pending.
59. The Montenegrin authorities now submit that the draft amendments to the Law on Prevention of Corruption further clarify the definition of a gift, specifying it as any item, right, or service acquired free of charge or at significantly more favourable conditions, as well as any other gain provided to a public official or related person in connection with public function (Article 2 of draft amendments). The draft amendments also stipulate that public officials must not accept gifts in connection with the exercise of public function (Article 18 of the Law on Prevention of Corruption), and set out procedures for declaration, reporting, and accounting of gifts, with the timeframe and responsibilities to notify the ASK, as well as sanctions for breaches of these restrictions (Article 43 of the Law). Protocol gifts are defined as those given by representatives of other states or international organisations on official occasions, and appropriate gifts

are those with a value up to €50,²⁹ received when gift exchange is customary. The authorities indicate that the adoption of these amendments is imminent.³⁰

60. In addition, the authorities indicate that, pending the adoption of these amendments, the ASK has implemented a range of educational and preventive activities to enhance awareness and compliance among public officials with regard to gifts. In particular, in cooperation with external partners, the ASK developed and published a dedicated handbook for public officials on the legal regime relating to gifts and outlining practical guidance for lawful conduct in this area,³¹ an explanatory infographic on deadlines for reporting of gifts and applicable restrictions,³² and a guiding document on the differences between protocol gifts and appropriate gifts, using concrete examples.³³ Training sessions on integrity provided by the ASK to public officials continued addressing restrictions and obligations governing gifts. Finally, by way of example of the implementation of this framework, the authorities refer to the 2025 decision of the ASK whereby a senior official was sanctioned for acceptance of an inappropriate gift in connection with official travel.
61. GRECO notes with satisfaction the authorities' commitment to clarify the definition of "protocol and appropriate gifts", as well as restrictions and reporting obligations of PTEFs with regard to gifts. GRECO also welcomes the enhanced awareness-raising activities and tools, continuously developed by the ASK with respect of gifts. The draft amendments to the Law on Prevention of Corruption relating to the definition, restrictions, acceptance, accounting and registration of gifts, applicable to PTEFs, would lead to a solid regulatory framework in this regard. However, until these amendments are adopted, the present recommendation cannot be considered as complied with more than partly.
62. GRECO concludes that recommendation xi remains partly implemented.

Recommendation xii

63. *GRECO recommended that (i) asset and income declarations of all persons with top executive functions (PTEFs) be systematically subject to the various levels of the substantive control by the Agency for Prevention of Corruption (ASK); and that (ii) the*

²⁹ Excluding money, securities, or precious metals

³⁰ According to the authorities, the draft amendments have been further aligned with the recommendations of the GRECO, the Venice Commission and an anti-corruption expert and have been submitted on 27 April 2026 to the European Commission for final opinion. They are planned to be included on the agenda of the nearest session of Parliament with a view of adoption.

³¹ The handbook entitled "Public Officials and Corruption Prevention", published in 2024, is accessible via the following link (in Montenegrin): https://www.antikorupcija.me/media/documents/Javni_funkcioneri_i_prevenција_korupcije_-_publikacija_final.pdf

³² An explanatory infographic entitled "Reporting of Appropriate and Protocol Gifts", published in March 2025 is accessible via the following link (in English): <https://www.antikorupcija.me/en/library/news-archive/2512031054-reporting-appropriate-and-protocol-gifts/>

³³ An explanatory infographic entitled "Difference between occasional and protocol gifts", published in September 2025, is accessible via the following link (in English): <https://www.antikorupcija.me/en/library/news-archive/2512030701-difference-between-appropriate-gift-and-protocol-gift/>

quality control mechanisms of the ASK be strengthened by ensuring pertinent human resources and accurate access to relevant information (databases) for the verification of the declarations.

64. GRECO recalls that this recommendation was partly implemented in the Compliance Report, as only a limited number of declarations submitted by PTEFs were subject to substantive control and verification, while the verification of declarations submitted by other PTEFs was based on a random selection. The development of new technical tools and methods to access relevant data, and steps to increase human resources of the ASK were noted, but these had not been completed at that time.
65. The authorities now report, in relation to the first part of the recommendation, that under the 2025 Annual Verification Plan, the ASK carried out verification of asset and income declarations of the Prime Minister (a violation established); all ministers (24 verifications completed, violations established in seven cases, eight requests for supplementary information were made, nine declarations were considered accurate); Deputy Prime Minister; six state secretaries (violations established in five cases, one declaration considered accurate); three advisers to the Prime Minister (violations established in all three); and three advisers to Deputy Prime Ministers (two considered accurate, one request for supplementary information made). In addition, the authorities indicate that in-depth verifications, entailing a detailed review of all declarations during their terms in office, was initiated for 30 officials, including three ministers managing largest budgets. Further, according to the authorities, the Annual Verification Plan for 2026, which is currently being implemented, includes verification of declarations of all PTEFs, totalling 119 officials, with an in-depth verification planned with regard to declarations of 36 officials during the third and fourth quarters of 2026.
66. With regard to the second part, the authorities submit that in April 2025, the ASK organised specialised training for staff responsible for verifying asset and income declarations, including the practical implementation of the verification process, proficiency in applying the methodology, and the use of checklists to ensure the accuracy and completeness of declarations. Further, the authorities report that access to other relevant databases continues to improve, including real-time connections to registers of the Tax Administration, Ministry of the Interior, Real Estate Administration, Central Securities Depository, Central Register of Business Entities, and the Central Bank, and additional harmonisation is underway for links to registers of beneficial ownership and public procurement. The ASK has concluded a memorandum of cooperation with the Special State Prosecutor's Office, and data-exchange arrangements with the Police Directorate's Sector for Financial Intelligence are also in progress. Finally, the authorities indicate that the ASK unit responsible for verification of declarations currently has eight employees (four of its own staff and four – assigned from other sectors of the ASK), and further recruitment is foreseen to strengthen operational capacity.
67. GRECO welcomes the additional steps taken by the authorities to expand the in-depth verification of declarations of assets and income to all PTEFs, according to the Verification Plan for 2026. GRECO stresses the importance of maintaining this approach

on a continuous basis and considers that the first part of this recommendation has been complied with. GRECO also notes with satisfaction the continuous progress in securing the ASK's access to other databases, where information included in declarations can be cross-checked during verification process. Nonetheless, GRECO believes that the considerable increase of the workload of the ASK unit responsible for in-depth verification of declarations requires allocation of adequate human resources to this unit. For the time being, GRECO cannot consider that this has been achieved. Therefore, the second part of this recommendation has been complied with only partly.

68. GRECO concludes that recommendation xii remains partly implemented.

Recommendation xiii

69. *GRECO recommended that the immunity provided to members of the government be revised in order to exclude explicitly corruption-related offences from such protection.*
70. It is recalled that this recommendation was not implemented in the Compliance Report, as no measures had been taken to revise the constitutional provisions on the immunity of members of government to explicitly exclude corruption-related offences from such protection.
71. The authorities now report that, on 7 November 2025, the ASK submitted a letter to the Secretariat General of the Government, highlighting the importance of fulfilling the recommendations of GRECO, and, with reference to this recommendation, the need to amend the constitutional provisions on the immunity for members of the government. Following this, on 16 April 2026, the Government adopted the Proposal for Amendments to the Constitution,³⁴ providing that the Prime Minister and members of the Government shall not enjoy immunity in respect of criminal offences committed in connection with the performance of their official duties. This proposal has been submitted to Parliament for consideration.³⁵
72. GRECO welcomes the tangible steps taken by the authorities to abolish immunity for members of government for criminal offences, including those related to corruption, committed in the performance of official duties. Bearing in mind that amendments to the Constitution require a high-level of consolidation of relevant actors, including in Parliament, GRECO considers that the steps taken by the authorities demonstrate their strong commitment to ensuring an effective criminal justice response to corruption. It encourages the authorities to proceed with the adoption of the amendments revising the immunity of members of the government so as to explicitly exclude corruption-related offences from its scope. Pending this, GRECO considers that the present recommendation has been implemented only partly.

³⁴ The proposed amendment modifies Article 86, paragraph 4 of the Constitution, thereby removing the existing scope of immunity protection in relation to corruption-related criminal offences.

³⁵ The press-release regarding the adoption by the Government of the Proposal to amend the Constitution is available via the following link: <https://www.gov.me/en/article/proposal-to-amend-the-constitution-adopted-immunity-of-government-members-for-corruption-related-criminal-offences-to-be-abolished>

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

Preventing corruption and promoting integrity in law enforcement agencies

Recommendation xvi

74. *GRECO recommended that (i) the Code of Police Ethics be revised, with the active participation of the police, and further expanded to cover all relevant integrity matters (including various situations of conflict of interest, secondary activities, gifts, contacts with third parties, outside activities, confidential information, etc.) and that it be enforceable and that (ii) it be supplemented with practical guidance containing concrete examples illustrating issues and risk areas.*
75. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted that the draft revised Code of Police Ethics had been prepared, covering matters such as gifts, conflicts of interest and third-party contacts. However, the draft Code was still pending adoption and did not address some of the integrity related issues (e.g., secondary activities, post-employment etc.). Moreover, the practical guidance on the implementation of the Code, with concrete examples, was yet to be developed.
76. The authorities now report that on 13 March 2026, the revised draft Code of Police Ethics, prepared by the Police Ethics Committee through consultations with the police and non-governmental organisations, has been adopted by the Ministry of the Interior and entered into force. The Code covers integrity-related areas such as prevention and management of conflicts of interest (Article 10), gifts and other benefits (Article 8), prohibition on using official position, identification, badge, weapons, or other equipment for personal benefit (Article 9), upholding confidentiality and proper handling of official information (Article 15) as well as standards of conduct during and outside working hours (Articles 7, 12 and 13). Further, the authorities submit that work is in progress on the drawing up a handbook, containing illustrated explanations and guidelines for each area covered by the Code of Ethics, which is expected to be completed in June 2026.³⁶
77. GRECO takes note with satisfaction of the adoption of the revised Code of Police Ethics, which is now in force. The fact that the preparation of the revised Code of Ethics included participation of representatives of various sectors, including the police, civil society and international experts is to be welcomed. GRECO encourages the authorities to finalise the development and approval of the practical guidance for the implementation of the Code, containing concrete examples, which is the only part of this recommendation that remains outstanding.
78. GRECO concludes that recommendation xvi remains partly implemented.

³⁶ On 11 June 2026, the Montenegrin authorities informed GRECO that the drawing up of Guidelines for the Implementation of the Code of Police Ethics has been completed. GRECO will assess this development, as well as the content of the Guidelines, during the next reporting exercise.

Recommendation xvii

79. *GRECO recommended that (i) systematic initial and in-service training on relevant corruption prevention matters and ethical norms and conduct be thoroughly updated and provided to all police officers at regular interval; and that (ii) a mechanism of confidential counselling on ethics and integrity matters be institutionalised in the police.*
80. GRECO recalls that this recommendation was partly implemented in the Compliance Report. GRECO noted that some training activities on integrity and whistleblower protection had been organised for police officers via e-learning and in-person seminars, but these had not reached all staff at regular intervals. Moreover, confidential counselling on ethics and integrity matters in the Police was still lacking.
81. The authorities now report that a training module entitled “Integrity and Police Ethics for Newly Employed Officers” was placed on the e-learning platform, covering the following four thematic units: integrity, corruption and the role of whistleblowers in its detection, the Police Code of Ethics, the obligation to report assets and income. In the course of 2025 and the first quarter of 2026, ethics and integrity training was attended by 101 newly recruited police officers. In addition, a total of 921 police officers attended dedicated training on whistleblower protection via the same online platform. As to police officers already in service, according to the authorities, from June 2024 to March 2026 some 194 police officers attended in-person trainings on integrity and police ethics, whistleblower protection, assessment of corruption risks and achieving results in the fight against organised crime and high-level corruption, strengthening the protection of human rights of detained and imprisoned persons, financial fraud and money laundering, financial investigations and analyses in the area of crypto currencies, the darknet, and the implementation of anti-money laundering mechanisms. In addition, 10 police officers participated in regional forums and conferences on the topics of police oversight and internal criminal investigations. Further activities are envisaged in near future, including the training for police officers on the topic entitled “*Procedures for reporting suspected corruption*” expected to be conducted in June 2026.
82. GRECO notes that training covering a broad range of integrity-related topics continues for newly recruited police officers, reaching a substantive number of beneficiaries. GRECO also notes that police officers already in service continue having access to training on ethics, integrity and anti-corruption, albeit in less significant numbers compared to new recruits. Moreover, GRECO regrets that no progress has been achieved in establishing confidential counselling on ethical conduct for police officers,³⁷ as no new developments are reported in this regard. It follows that this recommendation cannot be seen as implemented more than partly.
83. GRECO concludes that recommendation xvii remains partly implemented.

³⁷ On 11 June 2026, the Montenegrin authorities informed GRECO that a possibility of confidential counselling on ethics and integrity for police officers has been introduced through the adoption, on 5 June 2026, of an additional provision of the Code of Police Ethics (Article 22a). GRECO will assess this development during the next reporting exercise.

Recommendation xviii

84. *GRECO recommended that police officers be subject to integrity checks prior to their appointments and promotions, as well as at regular interval throughout their career according to a clear procedure which is made known to the candidates and the public.*
85. It is recalled that this recommendation was not implemented in the Compliance Report. GRECO noted that, aside from standard security screening prior to recruitment, no integrity checks were introduced for police officers before appointment or promotion, nor at regular intervals throughout their careers, as required by the recommendation.
86. The authorities now report that, following the September 2024 amendments to the Law on Internal Affairs, a formal mechanism for integrity checks prior to employment of police officers has been introduced. To support the implementation of this mechanism, in January 2025, the Ministry of the Interior adopted the Rulebook on the Implementation of a Special Procedure for the Employment of Police Officers, setting out the composition and responsibilities of a special commission³⁸ tasked with verifying the integrity and professional competencies of candidates,³⁹ conducted prior to assessing their knowledge, skills and abilities. The two-stage verification process consists of written and oral parts. Only candidates scoring at least 75% on the written test advance to the oral part.⁴⁰
87. Furthermore, in June 2024, the Ministry adopted the Rulebook on the Control of Assets, Income and Lifestyle of Police Officers, obliging all police officers to submit annual reports on their income and assets, including those of their spouses and children living in the same household. The control of reported assets, income, and lifestyle of police officers is conducted by verifying the accuracy and completeness of data, followed by comparison with lifestyle indicators. The controls are carried out for a specified number of officers, according to an annual plan approved by the Head of the Anti-Corruption Department, with the approval of the Minister. Thus, during 2025, annual reports on assets and income were submitted by 3 763 police officers, all of which have been reviewed by the Anti-Corruption Department of the Ministry of the Interior.⁴¹ Further, the authorities submit that following the entry into force of the amendments to the Law on Internal Affairs, which entered into force on 23 March 2026, security clearance verification for police officers already in service are to be conducted every five years, in

³⁸ A three-member Commission for the Verification of Integrity and Professional Competencies of Candidates, composed of an employee of the Anti-Corruption Department, a court expert in the field of psychology, and the integrity manager of the Ministry of the Interior.

³⁹ The integrity verification process includes a written test with questions on conflict of interest, gifts, and use of public property, a psychological integrity test, and a situational task on the subject of conflicts of interest, acceptance of gifts and the use of public property for personal purposes.

⁴⁰ This part evaluates candidates' understanding of ethical dilemmas, analysis of situations and decision-making, professional responsibility (commitment to integrity, impartiality and respect for the law), and communication skills (clarity, precision and argumentation).

⁴¹ In addition, the officer responsible for internal control within the Ministry also conducts oversight of the assets, income, and lifestyle of police officers, their spouses and common-law partners, children, as well as persons associated with them (Article 188 of the Law on Internal Affairs).

accordance with the annual verification plans.⁴² The authorities indicate that failure to submit a report or entering inaccurate data in the report, constitutes a serious breach of official duty (Article 173, paragraph 1, subparagraph 27 of the Law on Internal Affairs), which is a basis for initiating disciplinary proceedings that could result in disciplinary measures.⁴³ In addition, police officers of senior ranks are required to submit annual asset and income declarations to the ASK.⁴⁴

88. Finally, the authorities report that the September 2024 amendments to the Law on Internal Affairs introduced a new Article 144a, stipulating that a police officer may be granted extraordinary promotion⁴⁵ to the next higher rank provided that they possess the necessary educational qualifications, have not received two disciplinary measures for minor breaches or one measure for a serious breach of official duty in the previous three years, have not violated the Police Code of Ethics in the same period, and are not subject to ongoing criminal or disciplinary proceedings for serious breaches.
89. GRECO takes note of the introduction of integrity checks in the context of recruitment of police officers, which is a positive development contributing to the implementation of this recommendation. With respect to police officers already in service, GRECO notes that clean records of previous or ongoing criminal, disciplinary and other proceedings are among the determining factors in the context of extraordinary promotion procedures. Further, GRECO believes that the newly introduced requirement of submitting annual reports on income and assets covering the entirety of police officers, their regular verification by designated entities in the Ministry of the Interior and additional controls with respect of senior police officers provide for a solid range of tools for preventing possible conflicts of interests in the Police. Therefore, GRECO considers that this recommendation has been complied with.
90. GRECO concludes that recommendation xviii has been implemented satisfactorily.

⁴² Prior to the entry into force of these amendments, such verifications could only be conducted upon request of the immediate supervisor of the officer concerned.

⁴³ As per Article 174, paragraph 2 of the Law on Internal Affairs, the following disciplinary measures may apply in case of established violations:

- a fine amounting to 20% to 40% of the monthly salary paid for the month in which the violation of official duty was committed, for a period of two to six months;
- ineligibility for promotion to the immediately higher rank for a period of two to four years;
- reassignment to another position for which the immediately lower rank is prescribed, for a period of one to two years;
- conditional termination of employment; or
- termination of employment.

⁴⁴ More specifically, police officers holding the ranks of Chief Police Inspector, Senior Police Inspector First Class, Senior Police Inspector, Independent Police Inspector, Chief Police Advisor, Senior Police Advisor First Class, Senior Police Advisor and Independent Police Advisor must submit annual declarations on their assets and income, as well as those of their spouse/partner and children living in a shared household, to the ASK.

⁴⁵ The decision on such extraordinary promotion is made by the Director of Police, with the consent of the Minister of Internal Affairs, taking into account the officer's work performance and operational needs.

Recommendation xix

91. *GRECO recommended ensuring that policy and/or legal measures are sufficient and properly implemented so that appointments of police officials are merit-based and free from undue political influence, including at the top level.*
92. GRECO recalls that this recommendation was not implemented in the Compliance Report. The legislative framework referred to by the authorities had already been taken into consideration in the Evaluation Report, and no new legislative or practical measures to implement this recommendation were reported at that time.
93. The authorities now submit that, pursuant to Article 127 of the Law on Internal Affairs, a person may not be employed as a police officer if they have been convicted by final judgement for a criminal offence prosecuted *ex officio*, have received a prison sentence for a corruption-related offence, or have been sanctioned for misdemeanours involving violence or behaviour unsuitable for police work. Further, Article 143 of the Law provides that promotion to a higher rank requires a positive performance appraisal over the previous four years, absence of convictions or ongoing major disciplinary or criminal proceedings, and adherence to the Police Code of Ethics. In addition, the authorities consider that the recently established system of annual verifications of police officers' assets, income and lifestyle (see paragraph 87 above) contributes to strengthening the integrity within the Police. Finally, the amendments to the Law on Internal Affairs adopted in September 2024 introduced five new articles enabling the Ministry of the Interior to employ police officers through a special employment procedure, subject to the approval of the Government and the opinion of the Ministry of Finance.
94. GRECO regrets that no new measures appear to have been taken in response to this recommendation. Most of the legal provisions referred to by the authorities have already been taken into consideration, and the new procedure of extraordinary appointments does not remedy the concerns underlying this recommendation. The introduction of reporting on assets and income, while positive in the context of integrity verification, does not relate to merit-based and transparent appointment and promotion procedures in the Police. Therefore, this recommendation cannot be seen as implemented, even partly.
95. GRECO concludes that recommendation xix remains not implemented.

Recommendation xx

96. *GRECO recommended that the internal control system of the police be strengthened by adopting clear rules on the respective roles of the Department for Internal Control, the Anti-Corruption Unit and the Ethics Commission and by ensuring that appropriate resources are allocated to these bodies.*
97. It is recalled that this recommendation was not implemented in the Compliance Report. No new measures were reported regarding strengthening the coordination of internal

institutional mechanisms for controlling police activity, and no information was provided on allocating appropriate resources to these bodies.

98. The authorities now report that the updated Rulebook on Internal Systematisation and Organisation of the Ministry of the Interior (published on 31 October 2025) further clarifies responsibilities and resource allocation among internal oversight bodies.⁴⁶ In particular, Article 11 of the Rulebook stipulates that the Internal Control Department is responsible for checking the legality of police operations, particularly regarding human rights protection in police activities, undertaking operational measures to detect and suppress criminal offences committed by police officers, and monitoring internal discipline and professional ethics within the police. Article 14 of the Rulebook sets out the duties of the Anti-Corruption Department, including reviewing and analysing organisational units, especially those engaged in public procurement, undertaking preventive measures to detect and suppress corruption and other forms of misconduct among employees, and monitoring implementation of the Integrity Plan.⁴⁷ Finally, the authorities submit that the Internal Police Control Department and the Anti-Corruption Department have both been reinforced through upgraded material and technical resources and improved office space, and salaries for employees in both departments were increased by 30% as of 1 February 2026. Furthermore, recruitment process is ongoing to increase the staff capacity of the Internal Police Control Department, and the Anti-Corruption Department currently has a total of 12 staff members (representing 50% of its staffing capacity).
99. GRECO notes that steps have been taken by the authorities by introducing more detailed provisions in the updated Rulebook on Internal Systematisation and Organisation of the Ministry of the Interior to delineate the respective responsibilities of different bodies responsible for internal controls and corruption prevention in the Police. The ongoing efforts to allocate additional technical and human resources to these bodies is also a positive signal, but these resources must be continuously strengthened and effectively implemented in practice.⁴⁸
100. GRECO concludes that recommendation xx has been partly implemented.

⁴⁶ The authorities also reiterate the provisions regulating internal control of the Police (Articles 185, 194 and 195 of the Law on Internal Affairs) and its Ethics Committee (Article 30 of the Law on Internal Affairs), which were taken into consideration at the time of the evaluation.

⁴⁷ The authorities take the view that bearing in mind the distinct mandates and focus of the Internal Police Control Department, the Anti-Corruption Department and the Ethics Commission, these three bodies are specialised and complementary, with well-established referral procedures in cases involving legal, ethical, or integrity matters.

⁴⁸ According to the European Commission document entitled “Montenegro 2025 Report”, the Commission recommends to “urgently reorganise the Ministry of Interior and the police to strengthen corruption prevention and internal control.” Full text of that report is available via the following link: https://enlargement.ec.europa.eu/document/download/9ae69ea7-81d6-4d6a-a204-bd32a379d51d_en?filename=montenegro-report-2025.pdf

Recommendation xxi

101. *GRECO recommended to ensure that a solid external mechanism for complaints against the police be established, independent from the police and the Ministry of the Interior and with an appropriate level of knowledge to deal with such matters.*
102. GRECO recalls that this recommendation was not implemented in the Compliance Report. The authorities provided no substantive information to demonstrate the existence of a solid external mechanism for complaints against the police, independent from the Police and the Ministry of the Interior, including with regard to the necessary independence and qualifications of members of the Council for Civilian Control of the Police Work to enable it to deal with police matters effectively.
103. The authorities now report that several steps have been taken to enhance external oversight of the Police. First, with regard to the Council for Civilian Control of Police Work, the authorities point to its composition, consisting of five members appointed from among representatives of the Bar Association, the Medical Chamber, associations of lawyers, the University of Montenegro, and non-governmental organisations specialising in human rights. The official website⁴⁹ of the Council publishes conclusions and assessments regarding actions taken on its own initiative or in response to citizen's complaints,⁵⁰ mechanisms for improving the work of police officers and possibilities for accountability. It also hosts several guiding documents for the general public,⁵¹ including the Guide for Access to Information, its Rulebook on the Procedure for Handling Complaints, as well as annual and special reports.⁵² Moreover, the authorities indicate that the public visibility of activities of the Internal Control Department of the Ministry of the Interior has been enhanced by regular publication on the Ministry's website of information on complaints received and the outcomes of the related activities. In addition, in October 2025, the Ministry launched the "Virtual Police Station" application, which allows the anonymous submission of complaints against police officers. To date, 11 complaints have been submitted via this application. Furthermore, the Ombudsman of Montenegro continues addressing complaints related to police misconduct, undertakes independent investigations, issues recommendations to the Ministry of the Interior, and publishes annual reports with statistical data and findings on the official website.
104. GRECO recalls that the "three-rings" police oversight system, once again referred to by the authorities⁵³ was already taken into account at the time of the evaluation. GRECO takes note of some further measures to enhance the transparency of proceedings

⁴⁹ The website of the Council is accessible via the following link (in Montenegrin): <http://www.kontrolapolicije.me/ocjene-preporuke-izvjestaji>

⁵⁰ In 2024 and 2025, the Council received and acted upon 14 complaints relating to police conduct, resulting in 12 recommendations, all of which have been implemented.

⁵¹ These guides are accessible via the following link (in Montenegrin): <http://www.kontrolapolicije.me/biblioteka/propisi>

⁵² According to the authorities, these reports provide details on complaints reviewed, assessments made, recommendations addressed to the Ministry of the Interior, and responses received from the relevant authorities.

⁵³ Carried out through parliamentary, civilian, and internal control, as well as by the Ombudsman.

concerning complaints received against the Police and their outcomes, notably through the publication of relevant information on the websites of the Council for Civilian Control of Police Work and of the Ministry of the Interior. In particular, GRECO recognises the added value of the Council in drawing attention to misconduct, procedural violations and other irregularities in the Police. However, the impact of its recommendations is limited, as it depends on the willingness of institutions to follow up. Therefore, a solid external mechanism for complaints against the Police remains lacking.⁵⁴ It follows that this recommendation can be considered as implemented only partly.

105. GRECO concludes that recommendation xxi has been partly implemented.

Recommendation xxii

106. *GRECO recommended that the existing measures on whistleblowing within the police be strengthened by raising awareness and developing training on whistleblowing.*
107. It is recalled that this recommendation was partly implemented in the Compliance Report. GRECO noted that some incremental steps were taken to raise awareness of the existing whistleblower protection framework, but the number of police officers who benefited from recent training initiatives remained low.
108. The authorities now report that further measures have been taken to strengthen whistleblower protection and awareness within the police. In particular, several training models and awareness-raising campaigns have been developed for officials of the Ministry of the Interior, and training on the protection of whistleblowers is systematically included in the Training Plan for Civil Servants and Police Officers, delivered via the Ministry's e-learning platform. In 2025 and the first quarter of 2026, a total of 921 police officers participated in these trainings. In addition, this topic is included in the training module for newly recruited police officers (see paragraph 81 above). Further, in the last quarter of 2024, the ASK, in cooperation with the Police Academy and the Ministry of the Interior, delivered three dedicated trainings for members of the Police Administration and Customs Administration focusing on whistleblower protection at border crossings. Representatives of the Ministry of the Interior took part in a two-day training for persons authorised to receive and process internal whistleblower reports in the public sector, organised by the ASK and the UNDP in June and September 2025. Finally, The authorities submit in December 2022, the Ministry of the Interior adopted the Instruction on the Handling of Reports of Endangerment of the Public Interest Indicating Corruption, which has since been in application.

⁵⁴ Reference is made to paragraph 179 of the Fifth Round Evaluation Report on Montenegro, which reads, in particular, as follows: “the existence of a body outside the police and the Ministry of the Interior entrusted to deal with complaints from citizens concerning alleged misconduct of members of the police is a fundamental institution to avoid that complaints against the police are dealt with internally by the police (“the police investigating the police” is to be avoided).”

109. GRECO notes the significant increase of police officers benefitting from various training and awareness-raising activities on the protection of whistleblowers, which is to be welcomed. It would appear that these initiatives are conducted at regular intervals and have reached a substantive number of police officers, both new recruits, as well as those already in service. GRECO is therefore satisfied that the requirements of this recommendation have been met.
110. GRECO concludes that recommendation xxii has been implemented satisfactorily.

III. CONCLUSIONS

111. **In the light of the foregoing, GRECO concludes that Montenegro has implemented satisfactorily eight of the twenty-two recommendations set out in the Fifth Round Evaluation Report.** Of the outstanding fourteen recommendations, thirteen have been partly implemented and one has not been implemented.
112. More specifically, recommendations ii-v, xiv, xv, xviii and xxii have been implemented satisfactorily, recommendations i, vi-xiii, xvi, xvii, xx and xxi have been partly implemented, and recommendation xix has not been implemented.
113. In relation to persons entrusted with top executive functions (PTEFs), GRECO notes good progress in several areas, although final results have yet to be achieved in a number of them. The adoption of the Anti-Corruption Strategy for 2024–2028 and the explicit integration of PTEFs as a priority area, have led to integrity plans now covering ministers, state secretaries, advisers, and other senior officials. GRECO welcomes the formalisation of the inter-institutional cooperation between the ASK and the National Council for the Fight Against Corruption. Several key pieces of legislation, such as the draft Law on the Government, which is to establish integrity checks for PTEFs, and amendments to the Law on Prevention of Corruption, enhancing the asset declaration and conflict of interest regimes, have advanced significantly but remain to be adopted and effectively enforced. While the ASK has now included integrity testing into its regular recruitment procedures, its staffing needs to be further increased to strengthen its operational capacity. Progress has also been made in developing practical guidance and training on ethics and integrity for PTEFs, but an effective supervisory and enforcement mechanism, as well as confidential counselling, remain outstanding. Finally, GRECO notes promising developments with regard to revising the provisions on the immunity for members of government so as to explicitly exclude corruption offences, which have been set in motion at the level of Government and Parliament.
114. In relation to the police, GRECO notes that integrity checks have now been made part of recruitment procedures, and annual income and asset reporting has been introduced for all police officers. The improved methodological guidance on ethics and integrity issues is also a positive development. The adoption of a revised Code of Police Ethics is to be welcomed, and the adoption of a practical guidance for its implementation is expected in near future. Systematic initial training on ethics, integrity and the protection of whistleblowers now reaches nearly all new recruits; however, in-service training remains relatively limited, and confidential counselling on ethics and integrity

issues is not yet in place. More needs to be done to strengthen corruption prevention capacities and the internal control system of the Police, even though a modest increase of staff has been reported. The need to establish an independent and sufficiently robust external complaints mechanism with regard to the Police remains outstanding, and further efforts are necessary to institutionalise merit-based appointments, including at the top level, as a safeguard against political interference in police operations.

115. In view of the above, GRECO concludes that Montenegro is not in sufficient compliance with the recommendations contained in the Fifth Round Evaluation Report within the meaning of Rule 31 revised bis, paragraph 10 of the Rules of Procedure. GRECO therefore decides to apply Rule 32 revised, paragraph 2 (i) and asks the Head of delegation of Montenegro to provide a report on the progress in implementing the outstanding recommendations (i.e. recommendations i, vi to xiii, xvi, xvii and xix to xxi) by 30 June 2027.
116. In addition, in accordance with Rule 32 revised, paragraph 2, sub-paragraph (ii.b) of the Rules of Procedure, GRECO invites the President of the Statutory Committee to send a letter – with a copy to the Head of delegation of Montenegro – to the Permanent Representative of Montenegro to the Council of Europe, drawing attention to the non-compliance with the relevant recommendations and the need to take determined action with a view to achieving tangible progress as soon as possible.
117. GRECO invites the authorities of Montenegro 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.