HELLENIC REPUBLIC

ANNUAL REPORT 2025

NATIONAL TRANSPARENCY AUTHORITY

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ACRONYMS ABBREVIATIONS

AAP	Annual Action Plan
ACFE	Association of Certified Fraud Examiners
AFA	Anti-Corruption Agency of the French Republic
AFCOS	Anti-Fraud Coordination Service
ANAC	Italian National Anti-Corruption Authority
COCOLAF	Advisory Committee for the Coordination of Fraud Prevention
CPI	Corruption Perceptions Index
DG REFORM	Directorate-General for Structural Reform Support
DPIA	Data Protection Impact Assessment
DPO	Data Protection Officer
EDE	Sworn Administrative Inquiry
ENPE	European Network for Public Ethics
ESOEL	National Coordinating Body for Audit and Accountability
FEACC	Ethiopian Federal Ethics and Anti-Corruption Commission
GACIF	Global Anti-Corruption and Integrity Forum
GDPR	General Data Protection Regulation
GRECO	Group of States Against Corruption
GRNET	National Infrastructures for Research and Technology
HDPA	Hellenic Data Protection Authority
HSPPA	Hellenic Single Public Procurement Authority
IAACA	International Association of Anti-Corruption Authorities
ICS	Internal Control System
IRM	Implementation Review Mechanism
ISMS	Information Security Management System
JIACC	Jordan Integrity and Anti-Corruption Commission
KED	Greek Interoperability Center
LIBE	Committee on Civil Liberties, Justice and Home Affairs
MCs	Monitoring Committees
NACAP	National Anti-Corruption Action Plan
NACC	Lebanon's National Anti-Corruption Commission
NCPA	Network of Corruption Prevention Authorities
NGO	Non-Governmental Organisation
NIS	National Integrity System
NIS2	Network and Information Security 2
NTA	National Transparency Authority
OECD	Organisation for Economic Co-operation and Development
OLAF	European Anti-Fraud Office
REITs	Real Estate Investment Trusts
RPA	Record of Processing Activities
RRF	Recovery and Resilience Facility
SMART	Specific, Measurable, Attainable, Relevant, Time-bound
TIF	Thessaloniki International Fair
TIN	Tax Identification Number
UAEAA	United Arab Emirates Accountability Authority
UNCAC	United Nations Convention against Corruption

Message from the Governor

Alexandra Rogkakou

The Annual Report of the National Transparency Authority (NTA) for 2025 summarises the Authority's multifaceted and systematic efforts to strengthen integrity, transparency and accountability in every aspect of public life. In a constantly changing environment, the Authority successfully responded to emerging challenges, turning its strategic commitments into tangible and measurable results.

The audit work of the Inspections and Audits Unit was conducted with objectivity, a systematic approach and professionalism, covering critical high-risk areas. Leveraging modern risk analysis techniques, the NTA's Inspectors-Auditors completed numerous audit missions, contributing to the detection of cases of corruption and maladministration.

At the same time, with the development of the Digital Forensics Lab, we further upgraded our operational capabilities in the collection and processing of digital evidence, which is essential to the effective investigation of complex cases in the digital environment.

We completed the National Anti-Corruption Action Plan (NACAP) for the 2022-2025 period, implementing 120 targeted actions in cooperation with numerous public- and private-sector bodies to strengthen the resilience of the Greek state against corruption. We also initiated the planning of the new Strategy for the 2026-2030 period, conducting, for the first time, a risk assessment across 22 public policy sectors.

Regarding the strengthening of integrity and accountability safeguards, we placed particular emphasis on:

- Risk Management: We laid the foundations for identifying, assessing and mitigating corruption and fraud risks within the Greek public administration, promoting a framework of proactive management and institutional preparedness.

- Internal Control System: The supervision and provision of expertise to Internal Audit Units to support their smooth operation continued at an intensive pace.

- Integrity Advisors: The Integrity Advisor institution was significantly strengthened and expanded to an increasing number of bodies, serving as a valuable point of reference for guidance on ethical issues and contributing to the fostering of a healthy and safe working environment.

Finally, through awareness campaigns, educational programmes and open dialogues, the Authority continued to promote civic awareness, with a particular focus on the younger generation. Our goal remains to embed integrity as a fundamental value and encourage citizens to actively support our mission.

The achievements of 2025 represent not only a positive assessment of our performance but also the starting point for our future aspirations. The international recognition of the Authority's work vindicates our efforts, while simultaneously raising expectations.

I express my warm thanks to the Authority's Management Board for our excellent cooperation, and, above all, to the entire staff of the NTA. Their expertise, integrity and tireless efforts provide the strongest guarantee for the success of our mission.

We continue with the same determination, commitment and dedication to our vision: a modern, effective public administration that operates with absolute transparency and enjoys the trust of Greek citizens.

Message from the Chairman of the Management Board

Paraskevas Nomikos

This report presents the work of the National Transparency Authority (NTA) for the year 2025. As chairman of the Management Board, I, together with its members, am exceptionally proud of this work, and we trust that Greek citizens will evaluate it positively.

With unwavering commitment to its mission and strategic objectives, the Authority has demonstrated -as thoroughly detailed in the specific chapters of this report- significant and multifaceted work across its three pillars of activity: Audit - Prevention - Awareness-Raising.

Of particular significance within the framework of our country's national anti-corruption strategy is the completion and external evaluation of the National Anti-Corruption Action Plan (NACAP) 2022-2025, alongside the preparation of the subsequent plan for the 2026-2030 period.

Within the aforementioned framework of NTA actions contributing to the national anti-corruption effort, the improvement in our country's ranking in Transparency International's 2025 Corruption Perceptions Index (CPI), compared to the previous year, should be considered highly encouraging.

Regarding the operational framework of the Authority, the procedure for the appointment of its Governor was completed in 2025, in accordance with the provisions of Article 90 of Law 4622/2019, with the appointment of the new NTA Governor for a five-year term.

The Authority's Management Board, having now completed more than a year in its new composition, exercised its diverse responsibilities during 2025 with great dedication, as specifically reflected in the relevant chapter of the report, with a view to making a substantive contribution to the further improvement of the Authority's operations and the achievement of its objectives.

As Chairman of the Management Board, I wish to commend and congratulate the Inspectors-Auditors, the heads of the organisational units and all the officers and specialised associates of the Authority for the important work they performed during 2025. I also wish to warmly thank the Governor of the Authority, Ms Alexandra Rogkakou, and the Board members, Mr Stylianos Galoukas, Mr Nikolaos Douladiris, and Ms Zoe Karamitrou, for our excellent cooperation.

With our continued commitment to the principles of transparency, integrity, accountability and good governance as our continuous goal, we resolutely proceed with the fulfillment of our mission, aiming at the continuous improvement of public administration and the strengthening of citizens' trust in its institutions.

introduction

The Annual Report of the National Transparency Authority for 2025 is the seventh report since the establishment of the Authority and presents its activities throughout the reporting year, as well as the actions foreseen in its 2026 operational planning. Its preparation is provided for in Article 85(5) of Law 4622/2019 and is a key accountability and oversight tool of the Authority's activities. The Report is approved by the NTA Management Board and submitted by the Governor of the Authority to the President of Parliament and to the Committee on Institutions and Transparency. It is published by the National Printing House and posted on the Authority's website.

In 2025, the NTA implemented actions and projects across the three main operational pillars of its mandate (Audit - Prevention - Awareness Raising), with the aim of enhancing the effectiveness of its audit activities, strengthening integrity and accountability safeguards in public administration and raising awareness among citizens and businesses regarding corruption. At the same time, the NTA completed the external evaluation of the National Anti-Corruption Action Plan 2022-2025 and developed the new strategy for the period 2026-2030. With the support of resources from the Recovery and Resilience Facility, the NTA implemented significant projects aimed at modernising its operational capacity.

1. NTA AT A GLANCE

The National Transparency Authority (NTA) was established by Law 4622/2019 (A' 133)

- Independent Authority without legal personality
- Enjoys operational independence, administrative and financial autonomy
- Subject only to parliamentary control
- Exercises its competences across the public sector including:
  - bodies and services of the General Government
  - local authorities
  - legal entities governed by public law
  - state legal entities under private law and public enterprises
  - private bodies which enter into any type of contract with the public sector
- NTA's territorial jurisdiction extends throughout Greece

Operational Pillars

DETECTION

Perform audits and investigations

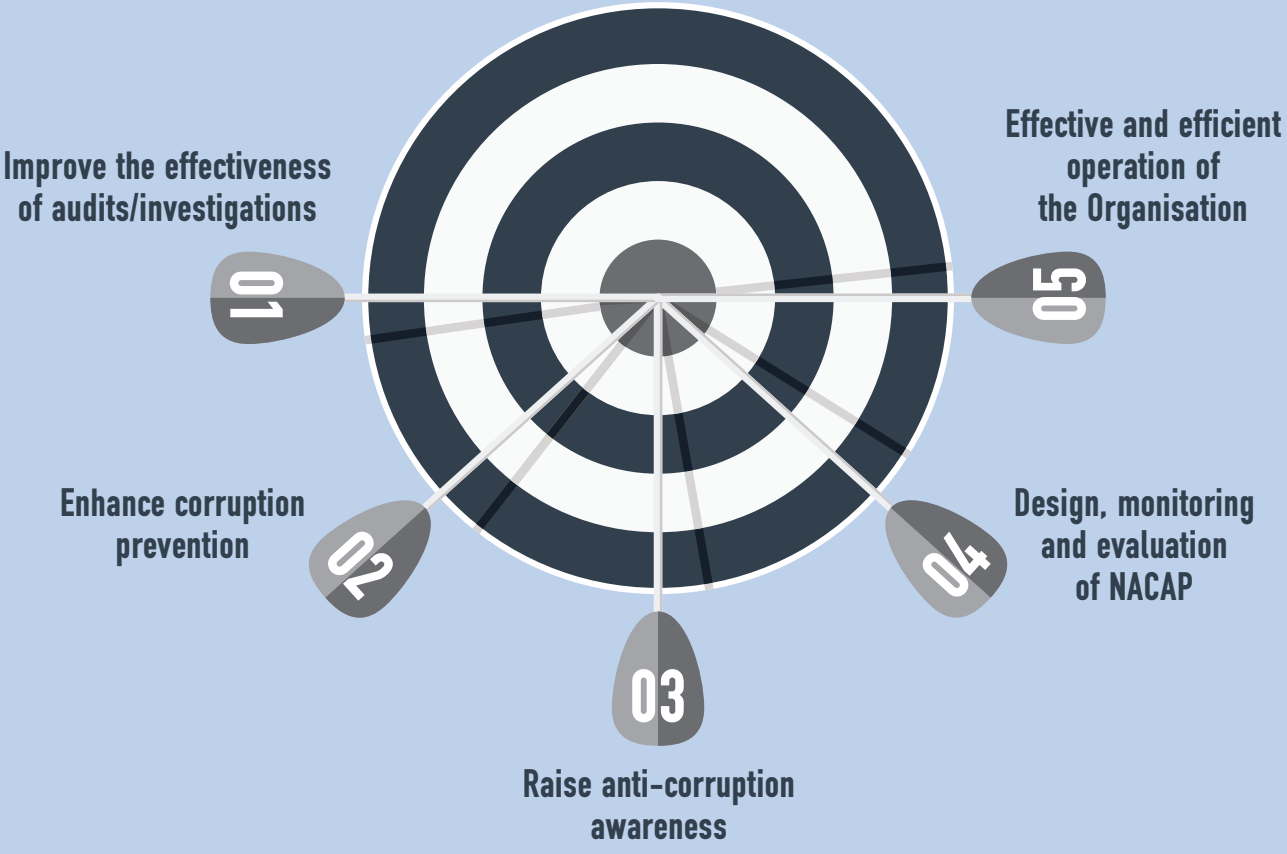
PREVENTION

Develop internal audit standards, codes of ethics/conduct, conflict of Interest, sectorial anti-corruption strategies et.al.

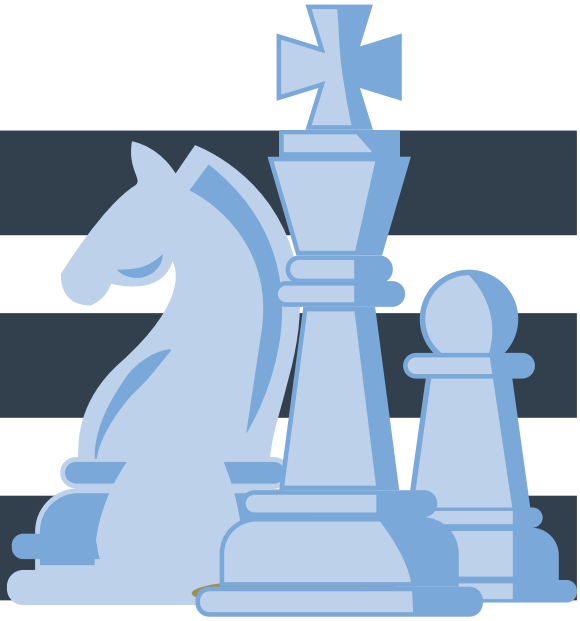
RAISING AWARENESS

Promote trust to public institutions, educate the youth, engage citizens and civil society organisations

Strategic Objectives



Strategic Plan 2023-2027



Important planning tool that sets medium term strategic and operational priorities

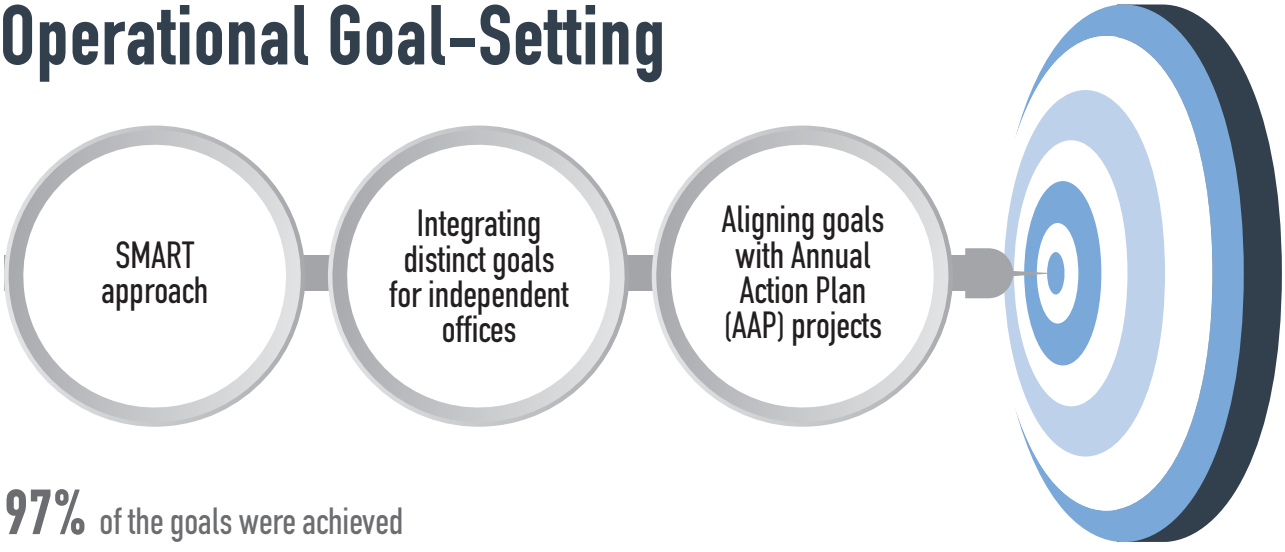
Product of broad consultation with the Organisation's management and staff

Published in March 2023

The Strategic Plan 2023-2027 is available at:

https://aead.gr/publications/essays/stratigiki-sxedio-ead-2023-2027

Operational Goal-Setting



97% of the goals were achieved

Changes in the institutional framework

Whistleblowing

The scope of Law 4990/2022 (A' 210) has been expanded to include individuals who report or disclose breaches:

- In the cryptocurrency market sector [Article 114 of Law 5193/2025 (A' 56)]
- Of EU restrictive measures [Article 9 of Law 5232/2025 (A' 163)]

Asset Declaration

The institutional framework for Asset Declaration (Law 5026/2023) was amended by Laws 5172/2025 (A' 10) and 5193/2025 (A' 56), introducing provisions regarding the obligation of:

- Entities to issue a certificate with the data referred to in Article 21(6) of Law 5026/2023
- Chairmen, chief executive officers (CEOs), executive board members and general managers of Real Estate Investment Trusts (REITs) to submit Asset and Interests Declarations

Disciplinary Law

Law 5225/2025 (A' 152) sets out the disciplinary powers of the NTA Governor, who has, inter alia, the power to:

- exercise disciplinary authority over employees falling within the scope of the Code of Status of Public Civil Servants and Employees of Public Legal Entities (Law 3528/2007) and over employees of first- and second-level local government authorities, following an NTA report finding that the disciplinary bodies fail to exercise their disciplinary powers or fail to do so within the prescribed time limits, in particular where the offenses are close to become time-barred;
- refer cases to the Disciplinary Council, pursuant to the provisions of the Code of Status of Public Civil Servants and Employees of Public Legal Entities;
- lodge objections before the Disciplinary Council either in favour of the administration or of an employee.

Protection of minors

Law 5216/2025 (A' 118), which amended Law 3730/2008 on the protection of minors from tobacco and alcoholic beverages, specifies the role of the National Transparency Authority as an audit body for tobacco and alcohol use.

Human Resources & Staff Development



518 positions (74,9% filled by 31.12.2025)

93% highly skilled personnel

Inhouse training

- Implementation of a multi-disciplinary training programme with 989 participants from the NTA and other public bodies

Financial Management

Annual budget: approx. €9 million

Development of cost reduction policies

Budget Allocation	
MC 21 - Wages and Benefits	5.518.000,00 €
MC 24 - Purchases of Goods and Services	2.719.880,00 €
MC 31 - Fixed Assets	468.000,00 €
TOTAL	8.705.880,00 €

Source: NTA

Digital Transformation

Upgrading applications, systems, and technical equipment:

forms.aead.gr — The Application Submission System

ΕΑΑ ΣΥΣΤΗΜΑ ΥΠΟΒΟΛΗΣ ΑΙΤΗΣΕΩΝ

e-peitharxika.aead.gr — e-peitharxika application

ΕΑΑ ΠΑΡΑΚΟΛΟΥΘΗΣΗ ΠΕΙΘΑΡΧΙΚΗΣ ΔΙΑΔΙΚΑΣΙΑΣ

Design and development of new applications:

e-katalogismos.aead.gr — Application for the registration and electronic transmission of documents relating to the assessment or reduction of State revenue, through the Interoperability Centre (KED) of the General Secretariat for Information Systems and Digital Governance

training-peith.aead.gr — User training and support platform for the e-peitharxika.aead.gr application

Πλατφόρμα Εκπαίδευσης e-Peitharxika

isupport.aead.gr — Application supporting **(i)** the operation of the ISMS developed in accordance with ISO 27001:2022; **(ii)** the Authority's compliance with the GDPR, national cybersecurity legislation and the provisions of the NIS2 Directive as transposed into national law; **(iii)** risk management and internal preventive controls.

risksmanagers.aead.gr — Application for Knowledge sharing among risk managers of public entities

Project Portfolio

Development and adoption of Project Management Methodology

- **Implementation of 5 projects funded under the Recovery and Resilience Facility (RRF)**
  - Development of an Integrated Audit Management System and AI tool
  - Digital Forensics Lab
  - Information Security Management System (ISMS) - ISO 27001
  - Communication and awareness-raising actions against fraud and corruption
  - Public Sector Internal Control System Platform

Greece 2.0 NATIONAL RECOVERY AND RESILIENCE PLAN
Funded by the European Union NextGenerationEU

- **Completion of the technical support project "Enhancing transparency and integrity in public procurement through an integrated risk management system"** in cooperation with the OECD, the Hellenic Single Public Procurement Authority (HSPPA) and the General Secretariat of Commerce, **with funding from the European Commission (DG REFORM)**.

European Commission

- Participation in the EU co-funded research project **DATACROS III "Developing an ethical AI-driven tool-box for boosting cross-border financial investigations on organised crime networks"**

data | cros^3

2. OPERATIONAL ACTIVITY

2.1. Audits & Investigations



1.841 Investigation Orders

679 Audit Orders (excluding public health audit orders)

748 Asset declaration Audit Orders

381 Audit Orders for Anti-Smoking Legislation

131 Systemic Audit Orders for Healthcare Facilities & Public Services

985 Concluded Investigations

737 Audit Reports (excluding anti-smoking audit reports)

137 Audit Reports Indicating Disciplinary and/or Criminal Liability

Audit scope

- Public procurement
- Social Welfare and Social Insurance
- Health (Hospitalisation conditions, management of hospital and pharmaceutical supplies, prescribing practices and medical examinations – issuance of medical certificates)
- Licensing and Operation of Facilities (childcare facilities, food and beverage establishments, municipal cinemas, livestock facilities, ski resorts, sports facilities, educational institutions, camps, elderly care facilities)
- Transport (driving schools – KTEL Bus Companies, issuance of vehicle registration certificates)
- Migration and Violations of Fundamental Rights
- Environmental and Animal Protection (protection of natural and cultural environment, animal welfare)
- Addressing Illegal Construction
- Emergency Response and Natural Disaster Management
- NGO Register
- Granting of Benefits
- Administrative, Accounting and Financial Audits of Local Authorities and Legal Entities Governed by Public and Private Law
- Application of Labour Legislation and the Civil Service Code
- Application of Disciplinary Law Provisions

Pharmacies

Topic:

Supply and Distribution of Pharmaceutical Products

Findings:

- Discrepancies between the recorded and actual stock of medicines (surplus or shortage).
- Unlawful dispensing of medicines based on handwritten prescriptions.
- Failure to follow the proper procedure for returning pharmaceutical products to pharmaceutical wholesalers.
- Sale of non-prescription medicines to Chronic Haemodialysis Units and other locations (e.g. ships).
- Use/consumption by pharmacies of antibiotics for the preparation of veterinary medicinal products.
- Sale of topical antibiotics that are exempt from mandatory electronic prescribing.

Recommendations:

To the Ministry of Health:

- In cooperation with the Ministry of Economy and Finance, examine the appropriateness of exempting pharmacies from POL 1019/2015 (B΄ 221), in order to enable the recording of pharmaceutical product stocks and their distribution.
- Adopt regulatory provisions or issue an interpretative circular to regulate:
  - the sale of medicines by pharmacies (a) to Day Care Units and Assisted Reproduction Units and (b) to Chronic Haemodialysis Units that are included in the decisions issued by the President of the National Organisation for Medicines (EOF) in force concerning the prohibition of parallel exports and intra-Community distribution of medicinal products;
  - the dispensing of medicines included in the reimbursement of haemodialysis sessions, for which mandatory electronic prescribing also applies;
  - the conditions for retaining handwritten prescriptions in pharmacies.

To the Panhellenic Pharmacists Association:

- Issue circular instructions to its members concerning their obligations when processing handwritten prescriptions.
- Inform and remind its members of their obligation to comply with the legislation in force concerning the distribution of medicines and narcotic drugs.
- Take timely action to ensure the immediate configuration of information systems in accordance with the legislation in force.

To the Ministry of Digital Governance:

- Ensure the development of an application for scanning the new two-dimensional QR codes on medicine packages.

Camps

Topic:

Compliance with Legal Operating Requirements

Findings:

- Unlawful issuance of an operating licence.
- Shortcomings in equipment and adequately trained personnel.
- Failure to ensure the required staff-to-camper ratio.
- Operation of an inadequately equipped and understaffed medical unit.
- Failure to maintain a complete record documenting procedures for food and water hygiene and safety.
- Failure to renew licences for facilities and equipment in a timely manner; use of uncertified sports equipment.
- Absence of fencing and a firebreak along the entire perimeter of the camp.

Recommendations:

- Staffing with the required number of personnel.
- Operation of a fully equipped and adequately staffed medical unit.
- Training of personnel in matters relating to hygiene and safe living conditions.
- Maintenance of a complete record documenting procedures for food hygiene and safety.
- Issuance of the required certificates of compliance with the applicable safety standards for facilities, equipment and sports grounds.
- Renewal of licences for facilities and equipment where their validity has expired.

Student Housing Allowance

Topic:

Compliance with legal requirements in procedures for granting student housing allowances

Findings:

No deviations from the applicable legal provisions were identified.

Recommendations:

- Include, in future circulars, a deadline for submitting the required supporting documents, in order to avoid delays in completing the assessment of all applications.
- Issue an interpretative circular clarifying the meaning of the term "second university degree", particularly with regard to the Schools to which it applies.
- Abolish the population criterion used to calculate the size of the applicant's real estate holdings.
- In cooperation between the National Infrastructures for Research and Technology (GRNET) and the Ministry of Education, Religious Affairs and Sports, enable the system, through verification of the student's Tax Identification Number (TIN), to automatically display to the staff user any previous receipt of the allowance during the period in which the applicant was enrolled at another School or Department.

- Reconsider the criterion according to which the rented residence must be located in the same municipality established under the Kallikratis Programme as the city where the student is studying, and consider introducing a criterion based on geographical distance in kilometres.

Position of Responsibility Allowance

Topic:

Compliance with the prescribed procedure for granting the allowance for positions of responsibility

Findings:

Unlawful payment of the allowance was identified in 8 cases.

Recommendations:

- Revocation of unlawful decisions appointing individuals to positions of responsibility and recovery of unduly paid amounts.
- In the education sector:
  - Immediate and accurate entry and finalisation of data concerning the operation of school units in the Ministry of Education, Religious Affairs and Sports "mySchool" Information System.
  - Implementation of the Ministry's circular instructions and conduct of regular audits and cross-checks of data.

Mobbing

Topic:

Incidents of Workplace Violence and Harassment

Recommendations:

To the audited entity:

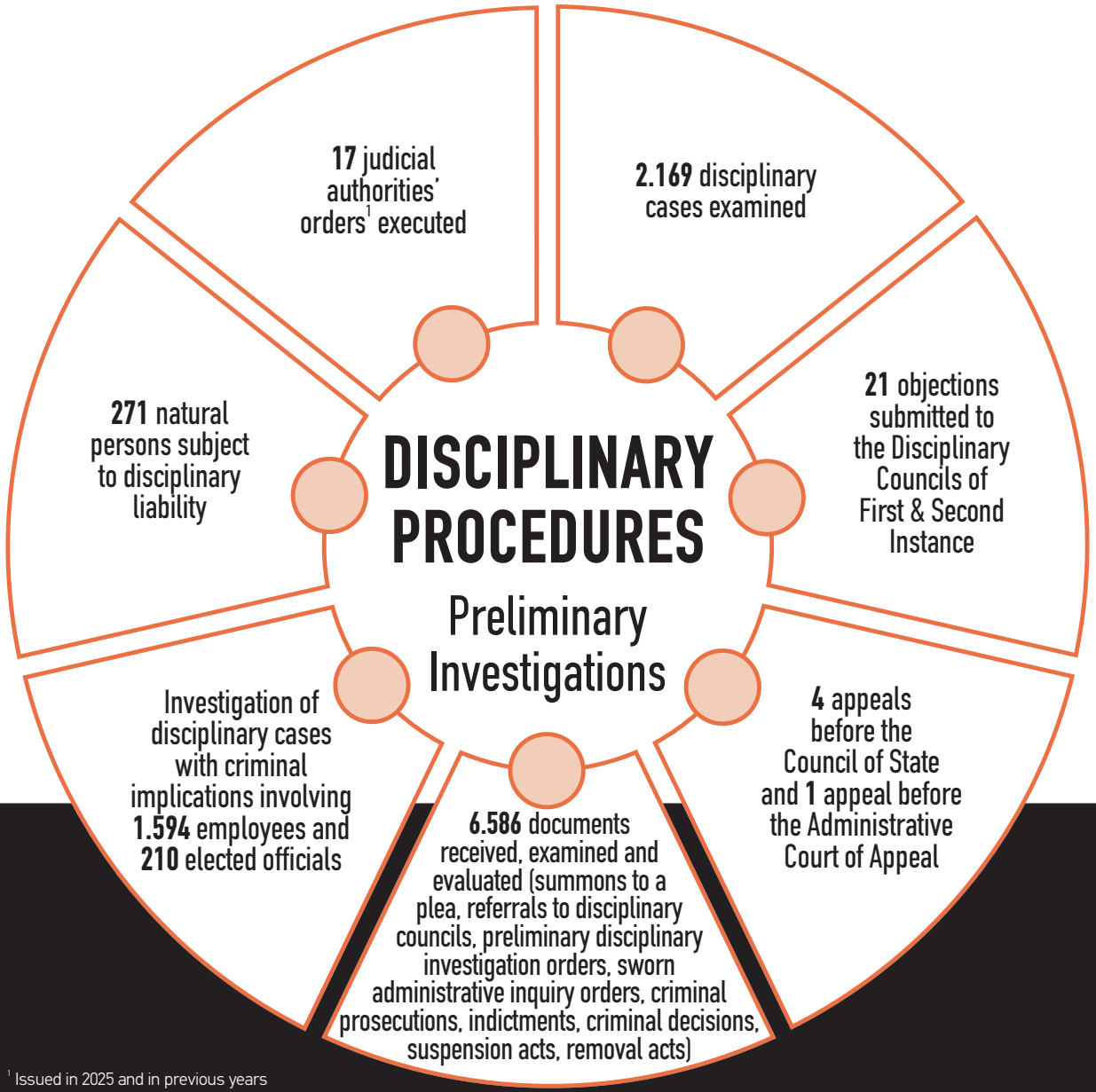
- Ensure the prompt resolution of any emerging cooperation-related issues, at both operational and interpersonal levels, in order to prevent demeaning and disparaging behaviour among employees.
- Strictly comply with the provisions of the applicable Ministerial Decision and take all preventive measures provided for therein with a view to achieving the objectives of the legislation for creating a working environment that respects, promotes and safeguards every person's right to a workplace free from violence and harassment, and preventing the recurrence of similar behaviour.
- Ensure the implementation of the recommendations included in the findings of each Sworn Administrative Inquiry (EDE).
- Take appropriate action within the framework of any applicable disciplinary proceedings.
- Immediately inform the NTA of any penalty imposed.

Asset Declaration Audits

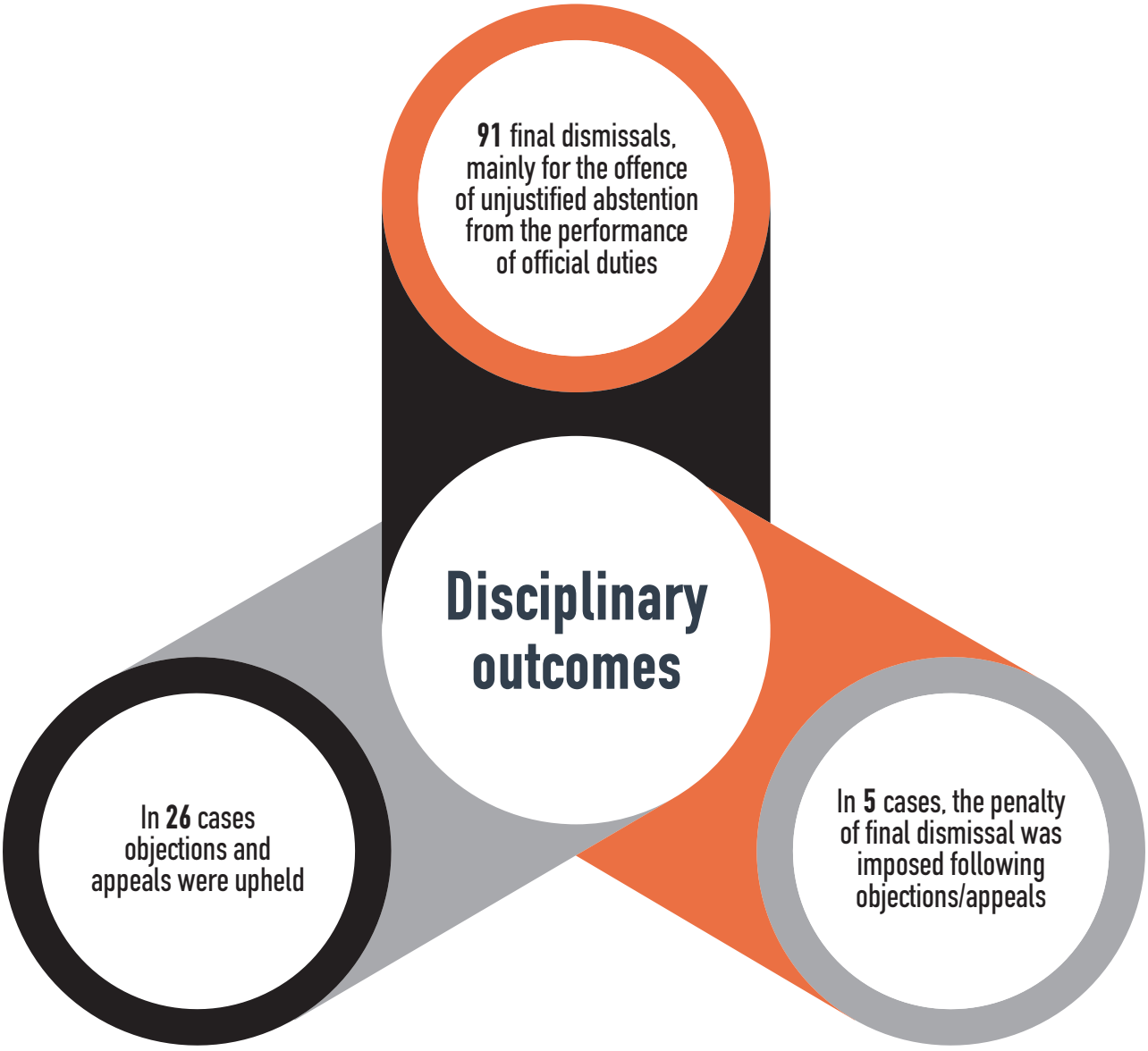
27.548	**persons subject to the asset declaration obligation in entities falling under the jurisdiction of NTA were audited for compliance with their obligation to submit declarations of assets and financial interests.**
11	**cases of unjustified increases in assets were identified.**

Implementation of Proposals – Recommendations in Audit Reports

77,67%	**of proposals – recommendations were implemented by the audited entities**



[1] Issued in 2025 and in previous years



Whistleblowers Protection

European Directive 2019/1937 was transposed into Greek legislation by Law 4990/2022 establishing a comprehensive framework for the protection of persons who, in the context of their professional activities, report breaches of EU law. According to the provision of said Law, NTA was designated as the external reporting channel for whistleblowers and as the competent authority for monitoring compliance in the public sector.

As of December 31, 222 persons have been designated as Responsible for Receiving and Following up on Reports (RRFRs).

Type of entity	RRFR
Hospitals - Regional Health Authorities	85
Municipalities	62
Legal Entities of Public and Private Law - Independent Authorities	53
Ministries	8
Decentralised Administrations	5
Universities	5
Regions	4
Total	**222**

Source: NTA

With the aim of strengthening the role of RRFRs, the NTA organised two webinars focusing on best practices and procedures for the effective follow-up and management of reports. The webinars were attended by RRFRs from 47 municipalities and 67 hospitals.

NTA Internal Reporting Channel

The NTA internal reporting channel operates on the following link: https://intwhistle.aead.gr

NTA External Reporting Channel[2]

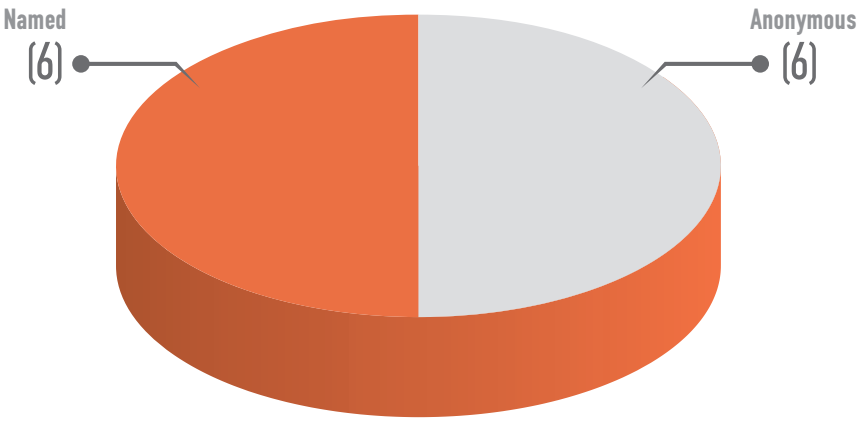
The electronic platform became operational on 11.09.2023 https://extwhistle.aead.gr

Of the 74 reports submitted to the NTA, twelve were assessed for their applicability under Law 4990/2022 and were categorised as follows:

Whistleblowing Reports	
Investigated	4
Referred to other audit bodies[3]	3
Archived	5
Total	12

Source: NTA

Named vs Anonymous Whistleblowing Reports



2.2. Strengthening Integrity and Accountability

2.2.1. National Integrity System (NIS) 2022-2025

- A comprehensive intervention to strengthen integrity safeguards in the Greek Public Administration
- Main objectives:
  - Prevent corruption in the public administration
  - Strengthen transparency, integrity and accountability
  - Inform and raise awareness among citizens.
- NIS is implemented in cooperation with the Ministry of the Interior. Monitoring takes place in the framework of the National Anti-Corruption Action Plan (NACAP)

[2] In accordance with Article 11 of Law 4990/2022, the NTA serves as the external reporting channel and is the competent authority for receiving, managing and following up on reports submitted directly to it concerning breaches falling within the scope of the Law.
[3] Of the three (3) reports, one (1) was referred to the Financial Prosecutor, another was referred to both the Financial Prosecutor and the Independent Authority for Public Revenue, and the third was referred to the Hellenic Competition Commission, in accordance with Law 4990/2022.

NIS implementation progress



2.2.2. Integrity Advisor

The Integrity Advisor is responsible for ensuring the effective protection of employees who observe, experience or wish to report integrity violations, as well as for providing support, information and advice on ethical and integrity-related issues in their workplace. The Integrity Advisor seeks to strengthen integrity and transparency mechanisms and ensure whistleblower protection.

- Integrity Advisors were appointed in eight (8) public sector bodies.
- The NTA issued an opinion on the establishment of Independent Integrity Advisor Offices in seven (7) public sector bodies.
- Four (4) Calls for Expressions of Interest were issued to fill positions in five (5) Independent Integrity Advisor Offices.
- On 1 December, the NTA organised a Workshop for Newly Appointed Integrity Advisors on the exercise of their responsibilities
- Sixty-six (66) Integrity Advisors received professional certification

Professional Certification of Integrity Advisors	
Number of trainees by type of entity	
Ministries	23
Municipalities	19
Legal Entities of Public Law	13
Regions	7
Independent Authorities	6
Decentralised Administration	5
Universities	5
Other	4
Total	82
Certified	66

Source: NTA

2.2.3. Lobbying

Pursuant to Law 4829/2021 (A' 166), the NTA manages and maintains the Transparency Registry, an electronic database of lobbying activities. Annual declarations on lobbying activities conducted between 1 January 2024 and 31 December 2024 were submitted by:

- interest representatives in January 2025
- lobbying recipients in May 2025

The 2025 Annual Report (reference year: 2024), together with statistical data on the operation of the Transparency Registry, has been published on the Registry's platform.

2.2.4. Internal Control System

Legislative and other regulatory initiatives

Law 4795/2021 (A' 62) established a comprehensive internal control framework for the public sector aligned with international standards to strengthen accountability mechanisms and enhance anti-corruption safeguards.
The legal framework on internal control was further strengthened by the provisions of Law 5013/2023 (A' 12) on risk management.
The NTA, is the competent authority responsible for developing the institutional and organisational framework of the Internal Control System (ICS).

In 2025, the NTA provided:

- Opinions on the issuance of four (4) regulatory acts establishing the conditions and criteria for the creation of Internal Audit Units in the supervised entities of the Ministries of Infrastructure and Transportation, Culture, Economy and Finance, and Education, Religious Affairs and Sports.
- An opinion to the Ministry of Social Cohesion and Family Affairs regarding the issuance of a decision on the commencement of the operation of its Internal Audit Unit.

Activities to support and monitor the work of Public Sector Internal Audit Units

- Drafting of standards/templates for the Annual Work Programme and the Annual Report of Internal Audit Units
- Development of a Sampling Guide
- Updating of the Standard Internal Audit Unit Rules of Procedure to align them with the legal framework established by Law 4795/2021 and ensure their applicability to all public sector entities
- Provision of guidance on the outsourcing of internal audit services to natural or legal persons
- Provision of guidance on the establishment and operation of Audit Committees in the entities referred to in Article 2 of Law 4795/2021
- Provision of guidance to Higher Education Institutions on ICS and the operation of Internal Audit
- Maintenance and updating of the Register of Internal Audit Units of public sector entities
- Coordination and guidance of the Internal Audit Units
- Support for the planning and conduct of the scheduled audits carried out by Internal Audit Units
- Provision of guidance and opinions on matters relating both to the application of the regulatory framework governing ICS and to the operation of Internal Audit Units

Professional Certification of Internal Auditors	
Number of trainees by type of entity	
Ministries	36
Municipalities & Regions	31
Independent Authorities	10
Universities	5
Other	60
Total	**142**
Certified	**137**

Source: NTA

2.2.5. Risk Management

Law 5013/2023 established a comprehensive risk management framework in the Greek public sector. The Law aims to enable the early identification and effective management of integrity risks. It also provides for the establishment of a Risk Register and a Central Repository of Corruption Risks which will serve as key tools for the

design of evidence-based anti-corruption policies.

In 2025, the NTA issued:

- A Joint Ministerial Decision with the Ministry of the Interior and the Ministry of Digital Governance (Β' 5335) establishing the Standard Risk Resister and providing guidance on its maintenance and updating, pursuant to Article 22H(3) of Law 4795/2021.

- A Joint Ministerial Decision with the Ministry of Digital Governance (Β' 5925) specifying matters relating to the operation of the Central Repository of Corruption Risks, pursuant to Article 22H(5) of Law 4795/2021.

Professional Certification of Risk Managers	
Number of trainees by type of entity	
Ministries	50
Municipalities & Regions	11
Independent Authorities	6
Decentralised Administration	2
Other	10
Total	79
Certified	58

Source: NTA

The NTA's Risk Management Team is responsible for designing and implementing the Authority's risk management policy and framework.

Focusing on the operational implementation of the NTA's Risk Management Framework, the NTA Risk Management Team carried out the following activities:

- Prepared the 2024 Annual Risk Management Report

- Developed a digital risk management library on the NTA's internal network

- Presented the approved Risk Management Policy and Framework to the NTA's staff

- Organised training workshops for NTA staff

2.2.6. Protecting the EU's Financial Interests (AFCOS)

The NTA is designated by Law 4622/2019 as the Greek Anti-Fraud Coordination Service (AFCOS), in cooperation with the Economic Crime Prosecutions Service (SDOE).

In 2025, the NTA/AFCOS participated in:

- The Monitoring Committees (MCs) of:

  - Eight (8) sectoral, eight (8) regional and six (6) other NSRF programmes for the 2014-2020 and 2021-2027 programming periods

- 2 plenary meetings of the Advisory Committee for the Coordination of Fraud Prevention (COCOLAF)

National Coordination for Cooperation with the European Anti-Fraud Office (OLAF)

The NTA/AFCOS carried out 29 operations as part of its coordination efforts (assistance to national audit authorities-information exchange, etc.) to ensure effective cooperation between Greece and OLAF in 27 cases, with the aim of protecting the financial interests of the European Union.

PIF Report 2025

The NTA/AFCOS, in cooperation with the relevant national authorities and agencies, compiled and submitted the PIF questionnaire to the European Commission, reporting the measures taken by Greece during 2024 to protect the financial interests of the European Union. Furthermore, it cooperated with the competent officials of the European Commission to ensure that these measures were duly reflected in the PIF Report.

National Anti-Fraud Network - NTA/AFCOS networking platform

https://AFCOS.aead.gr

- An important tool to strengthen communication with the bodies active in the fight against fraud and the protection of EU financial interests
- Maintained on the Authority's Intranet
- Continuously updated with informative and educational material
- 143 registered members (officials from 58 institutions)
- 43 posts within 2025

2.3. Raising Awareness

• 19 events – 5.305 participants

➢ Conferences, workshops and webinars on internal audit, risk management, public procurement, mobbing, foreign bribery, codes of ethics and personal data protection.

5° ΦΟΡΟΥΜ ΑΚΕΡΑΙΟΤΗΤΑΣ

5th Integrity Forum "Building a Future with Values: Youth and a Culture of Integrity" *

Held on the occasion of the International Anti-Corruption Day (9 December), the Forum focused on the student community, particularly from the university departments of law and political science at the National and Kapodistrian University of Athens, as well as departments of public administration at the Panteion University of Social and Political Sciences. The event was structured around two thematic units:

1. Anti-Corruption Prevention Policies and Tools
Particular emphasis was placed on the importance of complaints management systems and the contribution of academic knowledge to the development of integrity policies.

2. Citizens' Attitudes and Perceptions on Corruption
Using the Mentimeter digital platform, participants had the opportunity to answer the survey questions and discuss its findings in real time.



The NTA participated in the 89th TIF to inform visitors about its mandate and responsibilities in the fight against corruption. Two interactive workshops*, titled "Corruption Concerns Us - Your Opinion Matters!", were organised on 6 and 7 September. The events drew more than 350 citizens, institutional representatives and professionals from both the public and private sectors. Participants engaged in a live, anonymous voting session, where they expressed their views on corruption and proposed solutions to combat it, while also submitting questions to NTA officers regarding the Authority's mandate and initiatives.

Educational visit of the 2nd Model Junior High School of Athens at the NTA headquarters

The purpose of the visit was to inform and raise awareness among the children on issues related to corrupion, and to introduce them to the role and mission of the Authority. The students participated in an interactive discussion with NTA officers, analysing, among other things, key questions such as what corruption is, how it manifests, how it affects the social and economic development of the country, how it can be tackled, and how the younger generation can contribute to this effort.

• Media Campaign*

An integrated communication campaign was implemented, based on a phased communication strategy, with the objective of progressing from strengthening the Authority's visibility to fostering citizens' active participation in the fight against corruption.

PHASE I

Key message: ***National Transparency Authority: Source of Integrity, Bridge of Trust***
Objective: Strengthen the NTA's visibility.
Channels: Nationwide and regional television, radio, and digital media.
Duration: August - September 2025.



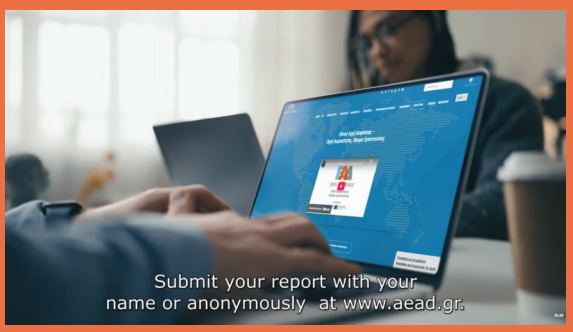


https://www.youtube.com/watch?v=VJbmZv9LP04

PHASE II

Key message: ***Fighting Corruption Is Everyone's Responsibility***
Objective: Mobilise society and encourage citizens' active participation in the fight against corruption.
Channels: Nationwide and regional television, radio, and digital media.
Duration: October - November 2025.





https://www.youtube.com/watch?v=n05BMb38bTs&authuser=0

• Public Opinion Survey on citizens' and public employees' perceptions on corruption*

Objectives:

- Explore the Authority's visibility
- Evaluate the effectiveness of actions implemented so far
- Collect data for the design and implementation of future actions

• National Student Creativity Competition "Integrity Leaders of Tomorrow"

- Aims to raise awareness among the school community of the values of transparency and integrity
- Takes place every two years
- The first phase of the 3rd Student Competition, themed "Young people talk about corruption and ways to deal with it", has been concluded. This initial stage involved evaluating all student submissions and selecting the top essays to advance to the second-phase of public speaking contests.

• Information brochure in Braille*

An information brochure has been published in Braille, enhancing accessibility to information for visually impaired individuals. This initiative confirms the Authority's commitment to equal access to information and equal treatment for all citizens, without exclusions. Through this brochure, citizens with visual impairments now have the opportunity to be independently informed about the NTA's competences, as well as the ways in which they can submit a complaint. The brochure will be distributed to organisations and associations for the visually impaired.

• Participation in the 42nd Authentic Athens Marathon

Under the slogan 'In the Race for Transparency, every step counts', the Authority made a dynamic appearance at the 5km race, reaffirming its commitment to promoting integrity, transparency, and the active involvement of its personnel in initiatives with a positive social impact.



* Implemented within the framework of the National Recovery and Resilience Plan 'Greece 2.0' cofunded by the European Union - NextGenerationEU and national funds.

2.4. National Anti-Corruption Action Plan (NACAP)

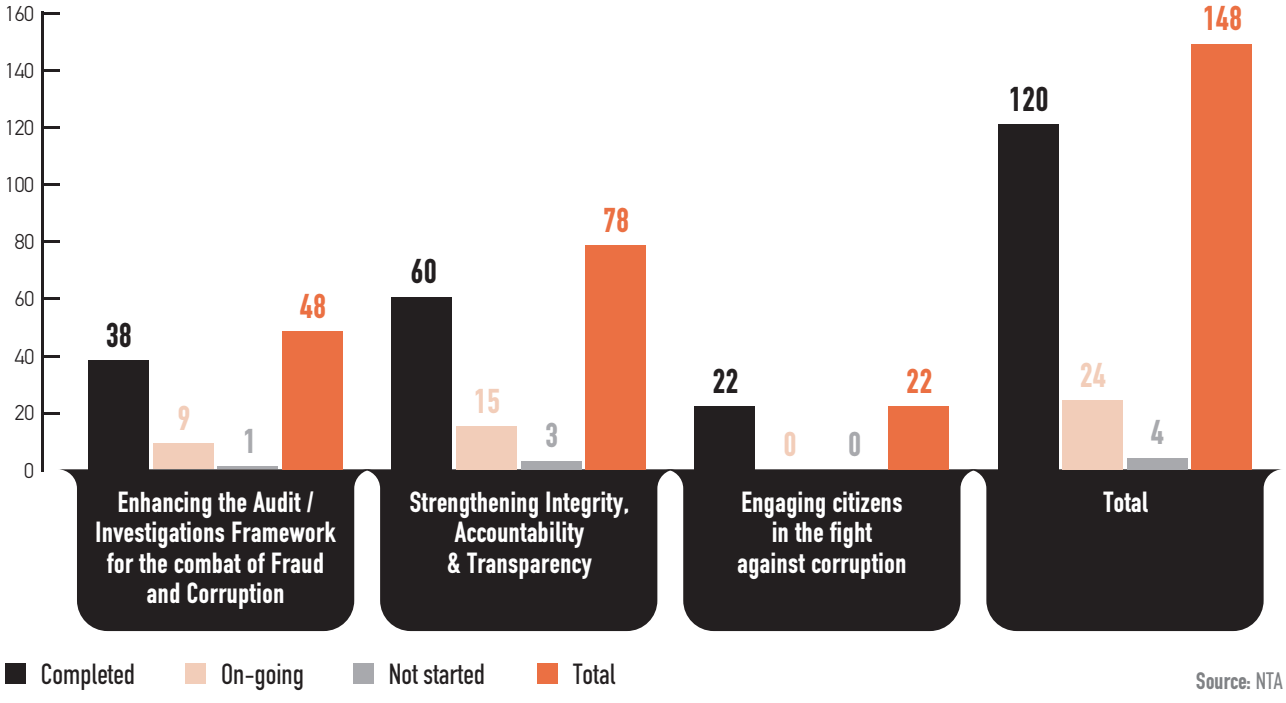
The National Anti-Corruption Action Plan (NACAP) is the national strategy to combat and prevent fraud and corruption and promote public integrity. At the same time, it serves as a dynamic tool for coordinating the action of public policy actors, the private sector and civil society in the effort to design, implement, monitor and evaluate horizontal and sectoral anti-corruption actions. NACAP builds on the findings of a national corruption risk assessment and integrates recommendations from international and European evaluation and cooperation mechanisms, such as the EU Rule of Law, UNCAC, the OECD and GRECO.

2.4.1. Monitoring and Evaluation of NACAP 2022-2025 Implementation Progress

The NACAP 2022-2025, as updated in 2024, includes 148 actions, out of which:

- 120 have been completed
- 24 are in progress
- 4 have not yet started

NACAP 2022-2025 - Implementation Progress per Strategic Objective



Source: NTA

2.4.2. External evaluation of NACAP 2022-2025

The external evaluation of NACAP 2022-2025 has been completed. The evaluation was conducted by an independent evaluator, drawing on both primary and secondary data.
According to the evaluation findings, NACAP 2022-2025 is characterised by a coherent structure and strong internal logic. Significant progress was identified in the implementation of its interventions, resulting in measurable institutional, regulatory and operational outcomes across key policy areas.
At the same time, the evaluation highlighted areas for improvement, including the need to identify priorities through risk-based analysis, broaden the stakeholder consultation process and strengthen the ownership of the actions by implementing entities.
The findings and recommendations of the evaluation informed the design of NACAP 2026-2030.

2.4.3. Design of NACAP 2026-2030

NACAP 2026-2030 retains the core structure, governance framework, and monitoring and evaluation mechanism of NACAP 2022-2025, while updating its vision, strategic objectives and design principles. The design of the new Strategy drew upon:

- Quantitative and qualitative implementation data from the 2022-2025 period
- Recommendations issued by international and European institutions (GRECO, the OECD and the European Commission)
- Findings from NTA surveys and the Special Eurobarometer on Corruption
- The mapping of priority areas based on corruption vulnerability

2.4.4. Corruption Risk Assessment (CRA)

During the design phase of NACAP 2026-2030 (November 2024 - May 2025), the NTA conducted a Corruption Risk Assessment (CRA) covering 22 public policy areas. To this end, a standard risk assessment methodology was developed, based on the evaluation of risk factors to assess both the likelihood of corruption incidents and their potential impact.
To support the evidence-based design of the Strategy, the assessment sought to:

- assess the level of vulnerability
- document progress made
- identify priority areas for intervention

The assessment was based on the collection of quantitative and qualitative data from a literature review, field research, interviews and NTA implementation data. It also drew on the operational experience of line ministries and audit/investigation bodies, as well as the contributions of the academic community and civil society organisations.

2.4.5. Consultation Process for NACAP 2026-2030

The preparation of NACAP 2026-2030 was supported by an extensive consultation process aimed at strengthening the Strategy's institutional legitimacy, feasibility and expected impact.
As part of this process, thirty (30) online consultation meetings were held with representatives from twenty-four (24) ministries, seven (7) independent authorities, eight (8) academic institutions, five (5) professional associations and four (4) non-governmental organisations.
The consultation process focused on refining the proposed interventions, clarifying institutional roles and responsibilities, and ensuring alignment between the objectives of the NACAP and the strategic and operational planning of the participating institutions.
The evidence-based exchange of experiences and proposals contributed to strengthening ownership of the actions among implementing entities and fostering cross-sectoral cooperation.

2.5. National Coordinating Body for Audit and Accountability (ESOEL)

Collective body composed of 17 law enforcement and AC entities at the national level (over 1.600 auditors and inspectors)

Main task: promote co-ordination

- Foster synergies/avoid overlaps
- Design joint actions/operations
- Promote inter-agency cooperation
- Disseminate good practices

NTA presides ESOEL

During the reporting year:

1. Three (3) audits were completed by the ESOEL Joint Audit Teams in land registries, sports federations and detention facilities, following orders issued pursuant to prosecutorial requests for the conduct of preliminary investigations. In parallel, audits by Joint Audit Teams continued in the health and pharmaceutical sectors, as well as in land registries.

2. One (1) new Joint Audit Team was established, with the mandate to conduct an audit in a Municipal Building Authority regarding the legality of building permit issuance procedures in administrative acts for the legalisation of unauthorized constructions.

3. Two (2) decisions were issued establishing working groups to update the Guidelines on Surcharge Proceedings and the ESOEL Audit Procedure Regulation, respectively.

4. More than 320 staff members from ESOEL member entities participated in the awareness-raising event entitled "National Coordinating Body for Audit and Accountability: Audits, Data Protection & Transparency", co-organised on 23 September by the NTA and the Hellenic Data Protection Authority (HDPA) within the framework of a Memorandum of Cooperation.

2.6. Ethics Committee

The Ethics Committee is established in the National Transparency Authority by decision of the NTA Governor, pursuant to Article 74 of Law 4622/2019, for the purpose of examining matters relating to the impediments, incompatibilities and rules for the prevention of conflicts of interest applicable to members of the Government, Deputy Ministers, General and Special Secretaries, governing bodies of public sector entities, and political appointees.

The Committee's Annual Report for the year 2025 is available on the Authority's website at the following address:
https://aead.gr/nta/epitropi-deontologias/ektheseis-epitropis-deontologias

2.7. Internal Audit

Assurance Services:

- Assessment of the most significant risks related to the audit function of the Inspections and Audits Unit, and identification and evaluation of the internally implemented risk mitigation measures.

- Evaluation of the personal data protection governance framework.

- Completion of follow-up reviews and assessment of the effectiveness of internal audit recommendations concerning cybersecurity and employees' health and safety.

- Submission of the Annual Report with Opinion to the Governor of the NTA.

Consulting Services:

- Provision of advisory recommendations to the Directorate of Strategic Planning and Behavioural Analysis regarding the monitoring and evaluation mechanism of the National Anti-Corruption Action Plan.

- Provision of advisory recommendations to the General Directorate of Integrity and Accountability and to the Hellenic Anti-Fraud Coordination Service for the protection of the financial interests of the European Union (AFCOS), regarding case management using modern artificial intelligence tools.

- Provision of advisory services to the Directorate of Financial Management regarding the documentation of depreciation and the useful life of fixed assets.

Participation in a seminar of the Hellenic Chapter of the Association of Certified Fraud Examiners (ACFE Greece), as part of the continuous enhancement of knowledge and skills in fraud prevention and investigation.

2.8. Data Protection

To ensure the Authority's compliance with the requirements of the General Data Protection Regulation (GDPR), the NTA Data Protection Officer (DPO) undertook the following actions:

- Provided opinions on Data Protection Impact Assessments (DPIAs) concerning video surveillance, the Occupational Physician, Prosecutorial Orders and personal data processing activities carried out in the context of audits conducted by the Inspections and Audits Unit.
- Updated the DPIA relating to lobbying activities.
- Updated the Record of Processing Activities (RPA).
- Updated the procedure for the secure publication of reports containing personal data on the NTA website and the personal data breach response procedure.
- Drafted the data protection policies for the websites of the National Coordinating Body for Audit and Accountability (ESOEL), the Risk Managers Network and the NTA Student Competition.
- Updated the data protection policies for the website of the Public Administration Integrity Advisors Network (dsadd.aead.gr) and the online application platform (forms.aead.gr).
- Provided advisory opinions to the NTA organisational units on personal data processing in matters relating to public procurement, requests for access to documents, information security, the preparation of Data Protection Impact Assessments, whistleblowing reports, the design of questionnaires on polls.aead.gr and the development of new electronic applications and information systems (data protection by-design).
- Provided advisory opinions to the Ethics Committee on the processing of personal data in relation to personal data disclosure requests and the application of pseudonymisation techniques.
- Delivered webinars on specific GDPR-related topics.
- Prepared and disseminated a questionnaire on personal data protection to raise awareness among the Authority's staff.
- Co-organised, in collaboration with the Hellenic Data Protection Authority (HDPA), a training workshop for ESOEL inspectors on personal data protection issues.

2.9. International Presence

NTA remains committed to international cooperation seeking to:

- forge bilateral and multilateral anti-corruption schemes in the field of public integrity
- identify opportunities to further strengthen the operational capacity of Greek audit bodies.

In 2025, the Authority took significant action at the international level participating in international evaluations and representing our country in international conferences and meetings.

2.9.1. International Evaluations

- **2025 Rule of Law Report**
  Key references to Greece's progress and outstanding recommendations:

Progress achieved:

- Establishment of a reliable track record of prosecutions and final judicial decisions in corruption cases, including high-level corruption cases
- Strengthening safeguards in public procurement and improving licensing procedures

Outstanding recommendations:

- Further strengthening of the lobbying framework

Participation in the exchange of views with the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE) on the state of democracy, the rule of law and fundamental rights in Greece.

The NTA presented to the LIBE Committee its recent institutional and operational initiatives to promote public integrity in Greece, in particular in the areas of internal audit, strengthening the institution of Integrity Advisors, lobbying, the gifts policy, risk management, whistleblowing, disciplinary justice and asset declaration audits.

2.9.2. International Partnerships

Participation in Multilateral Networks, Committees, Programmes and Working Groups of International Organisations:

- **11th Session of the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC) - Doha, 15-19 December 2025**

The Governor of the NTA, as Head of the Greek delegation, presented to the Plenary of the Conference the most significant institutional and operational developments in the field of anti-corruption, with particular reference to the design of the new National Anti-Corruption Action Plan (NACAP) 2026-2030, the risk management system, actions aimed at strengthening public integrity safeguards, as well as the promotion of a zero-tolerance culture towards corruption through the organisation of relevant awareness-raising activities.

NTA staff members participated in the following special thematic events of the Conference:

- "National Anti-Corruption Strategies", organised by the European Union.
- "From Review to Reform: 15 Years of the UNCAC Implementation Review Mechanism (IRM)", marking the 15th anniversary of the launch of the Implementation Review Mechanism of the United Nations Convention against Corruption.
- "Addressing Corruption in Public Procurement through Risk Management", organised by the Italian Anti-Corruption Authority (ANAC).

In addition, bilateral meetings were held between the NTA and its foreign counterparts, as follows:

- Lebanon's National Anti-Corruption Commission (NACC): Discussions focused on the framework for the protection of persons reporting breaches of Union law (whistleblower protection), as well as technical issues concerning the operation of the reporting support platform.
- France's Anti-Corruption Agency (AFA): Cooperation issues were discussed regarding the development of the European Anti-Corruption Strategy, within the framework of the participation of both Authorities in the European Anti-Corruption Network.
- Jordan Integrity and Anti-Corruption Commission (JIACC): The two Authorities discussed the exchange of expertise on public integrity issues and proposed strengthening bilateral cooperation.
- Ethiopian Federal Ethics and Anti-Corruption Commission (FEACC): Views were exchanged on the mandates and responsibilities of the two Authorities, and issues related to the Implementation Review Mechanism (IRM) of the United Nations Convention against Corruption were discussed.
- United Arab Emirates Accountability Authority (UAEAA): Discussions focused on the methodology for assessing complaints handled by the two Authorities, and it was agreed to further enhance existing cooperation in the areas of strategic planning and artificial intelligence (AI) through the exchange of expertise.

On the margins of the Conference, the Greek delegation met with the Ambassador of Greece to Doha, providing an opportunity to present the Authority's structure and functioning, as well as the latest reform efforts in the field of public integrity.

- **OECD Integrity Week and Global Anti-Corruption and Integrity Forum (GACIF) - Paris, 24-28 March 2025**

Meetings were held with heads of counterpart authorities and OECD officials to explore opportunities for bilateral cooperation, particularly regarding the use of artificial intelligence tools for the prevention and detection of corruption phenomena. On the margins of the event, a meeting was held with the Head of the Permanent Representation of Greece to the OECD, with a view to strengthening coordination of Greece's representation.

- **OECD Working Group on Public Integrity and Anti-Corruption & Task Force on Public Integrity Indicators**

The NTA participated in the meetings of the OECD Working Group on Public Integrity and Anti-Corruption, highlighting, in its capacity as a member of the Bureau, the progress in the digital transformation of audit mechanisms, particularly through RRF projects. Particular emphasis was placed on enhancing mechanisms for the prevention and detection of corruption phenomena, as well as on targeted awareness-raising among public officials and citizens.

During the meetings of the Working Group on Public Integrity Indicators, issues related to the effective use of data in the areas of Strategy and Internal Audit were examined, as well as the planning of data collection on

integrity safeguards within the justice system and the disciplinary control framework of the public sector.

- **Annual Conference of the International Association of Anti-Corruption Authorities (IAACA) - Doha, 12-13 December 2025**

The Authority participated in the Conference as a member of the Executive Committee. During the Conference, the admission of twelve new members was approved, including the Cyprus Anti-Corruption Authority.

The NTA Governor delivered remarks at the thematic session "Integrity for the Future: Innovation, Collaboration & Action against Corruption". Furthermore, during the session "Building Bridges", she highlighted the role of international cooperation by presenting the Greek experience and emphasising the importance of exchanging expertise and best practices for strengthening audit mechanisms.

- **Raoul Wallenberg Institute Workshop - Lund, 29 January 2025**
- **Technical Workshop on Digital Anti-Fraud Tools - Bucharest, 20-23 May 2025**
- **Annual Conference of the European Anti-Fraud Office (OLAF) - Helsinki, 11-12 June 2025**
- **3rd Meeting of the EU Network Against Corruption - Brussels, 15 October 2025**
- **European Network for Public Ethics (ENPE) - Budapest, 16-17 October 2025**
- **Study Visit - Asset Declaration Greece - Croatia, Athens, 6 November 2025**
- **INTERPOL Anti-Corruption & Asset Recovery Global Conference - Abu Dhabi, 11-13 November 2025**
- **Training Programme of the Multinational Peace Support Operations Training Centre - Kilkis, 1-5 December 2025**
- **Council of Europe Network of Corruption Prevention Authorities (NCPA) - Doha, 18 December 2025**

Bilateral Cooperation

- **Signing of a Memorandum of Cooperation with the United Arab Emirates Accountability Authority (UAEAA) to strengthen cooperation in the field of anti-corruption (25 September 2025)**
- **Signing of a Memorandum of Cooperation with the Independent Commission Against Corruption of Hong Kong (14 December 2025)**

3. OPERATIONAL PLANNING FOR 2026

The operational planning for 2026 involves interventions in the following areas:

- Modernisation of the audit framework
- National Integrity System
- Internal Control System
- Corruption Risk Management
- Awareness Raising and Communication Activities
- National Anti-Corruption Action Plan
- International Presence
- Human Resources Management
- Employee Skill Development
- Digital Transformation
- Security Policies
- Personal Data Protection
- Implementation of RRF Projects

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