

Excellencies, Distinguished Delegates,

The **National Strategic Plan for Combating Corruption (NACAP) for 2022 – 2025** constitutes Greece's national strategy for the combat and prevention of corruption, as well as for awareness raising through the implementation of a coherent framework of actions. It is results-oriented and encompasses a multi-dimensional approach focusing both on targeted sectoral interventions, as well as on actions of horizontal reform strategies.

An integrated **Management System** is also established providing an effective set of proportionate measures to combat fraud and corruption, double funding and to prevent conflicts of interest for **Recovery and Resilience Fund Actions**. A **Risk Analysis Methodology** for the ex-ante control of the non-existence of conflict-of-interest situations in the tendering phase of public contracting, is also applied while for ensuring transparency and impartiality, risk assessment is carried out automatically by the RRF Information system on the basis of predefined risk factors. A Fraud Risk Assessment Team and a Fraud Officer are **carrying out fraud risk assessments** and coordinating fraud prevention and response activities along with existing control mechanisms.

The use of **non-competitive bidding procedures, as well as the use of government emergency powers and regulations, with insufficient controls**, consultations and/or guidance has been identified as **typologies of risks in emergencies and crisis response**, but Circulars and guidelines issued by the competent authorities, specifying the conditions for sufficient reasoning concerning the exceptional emergency situations (COVID -19) have proved helpful.

Regarding the corruption risks identified with longer-term trends, competent public bodies have undertaken follow-up anti-corruption actions through either legislation initiatives, i.e. legislation for the recovery and management of frozen, seized and confiscated assets, or tools, such as the development of a mechanism for monitoring the progress of the Internal Control System implementation.

As for the measures taken to support the private sector in identifying and mitigating corruption risks: Apart from implementing raising awareness activities in cooperation, we would point out, for example the joint Ministerial Decisions issued during the peak of the Covid-19 crisis, on the declaration of stock of sanitary materials and food, with the aim to ensure sufficiency and to monitor prices as to avoid any unfair practices.

As for the efforts taken to understand the impact corruption may have on women in Greece, the National Plan for the Equality of Genders 2021-2025, has a separate axis aiming to the implementation of actions for reinforcing women's participation in the decision-making process through actions, encouraging them to become more involved in public life and help new models of successful women to emerge.

As regards anti-corruption safeguards, controls emphasis is given in enhancing auditing mechanisms. The National Coordination Body for Control and Accountability (ESOEL), chaired by the NTA, is established as a collective body composed of fifteen audit and investigation agencies, responsible for conducting jointed inspections/audits and preliminary examinations either on public procurement or cases of fraud/economic corruption in Greece.

A large number of audits are also carried out for the compliance with the emergency health measures due to pandemic, as well as for the public procurement procedures. **Within the framework of the National Public Procurement Strategy 2021-2025, a systemic approach is adopted**, with simultaneous initiatives taking place, such as legislative amendments, official guidelines and recommendations (i.e. specific issues that arose during the award and implementation of public contracts in the context of the response to COVID-19) and with digital transformations initiatives (i.e. enrichment of data

on a technical and statistical level in relation to COVID-19).

With regard to the Inter-institutional coordination at the national level: In Greece, except from the multilateral body of ESOEL, the Inter-institutional cooperation in anti-corruption efforts is also facilitated through MoUs, in order to build synergies across the Public Administration and to identify and prioritize targeted actions, i.e. Risk Assessment Methodology and Practices on sectors prone to corruption, network of Internal Auditors of Public Administration.

As for the transparency measures: Development and upgrade of registries and IT systems along with inducing efforts for more publicly available and accessible online information, i.e. a central **beneficial ownership** registry accelerates access to beneficial ownership information by the competent authorities. **In public procurement:** an integrity clause has been standardized to be included in the agreement signed with every contractor, as an important proactive step in enhancing transparency and accountability and citizen engagement and trust in public institutions, saving costs, improving competition and promoting awareness and a better understanding of the public procurement system.

Along with legislative initiatives (*transposition of EU Directive 2019/1937 into the Greek legal framework has begun*) reporting channels in the field of public procurement have also begun to be electronically available to citizens (providing a secure tool for filing anonymous complaints).

With regard to the Use of information and communication technology tools: A variety of digital and IT tools are available for monitoring and for actions' traceability, enhancing transparency and accountability. As examples of IT tools are the IMS for the Recovery and Resilience Fund (RRF), for the National Strategic Reference Framework (OPS ESPA) and the Central Electronic Public Procurement Registry (KHMDHS).

As regards the links between corruption and other forms of crime: The Strategy Committee is a representative example for addressing money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction (chaired by NTA's Governor), for the effective co-operation and co-ordination at the national policymaking level in Greece, with members participating from all the competent authorities, and from the private sector. The Strategy Committee along with the Central Coordination Unit/MoF constitute Greece's competent mechanism for identification, assessment, understanding and mitigating of ML/TF/PF risks.

As for Mitigation measures: we confirm the important role of technical assistance projects. Indicatively we highlight: the Mapping of national legal framework and international practices on how to identify, disclose, address, prevent, detect and manage present and potential conflict of interest situations and the design and conduct of a survey for public servants measuring the implementation and the impact of integrity policies etc. as framed in the project "**Strengthening the National Framework for integrity in the public sector (EEA GRANTS 2014-2020)**".