ARMENIA FIFTH ROUND OF ANTI-CORRUPTION MONITORING FOLLOW UP REPORT

The Istanbul Anti-Corruption Action Plan

OECD

Disclaimers

This work was approved by the OECD Anti-Corruption Network for Eastern Europe and Central Asia Plenary (ACN) on 8 July 2025.
This work was co-funded by the European Union. Its contents do not necessarily reflect the views of the European Union.

This document as well as any data and map included herein are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

Cover design: Based on © Angelique Portrait Photography LTD

About the OECD

The Organisation for Economic Co-operation and Development (OECD) is an international organisation that works to build better policies for better lives. Drawing on more than 60 years of experience OECD works closely with policy makers, stakeholders, and citizens to establish evidence-based international standards and to find solutions to social, economic and environmental challenges. OECD's core aim is to set international standards and support their implementation – and help countries forge a path towards stronger, fairer and cleaner societies. Find out more at www.oecd.org.

About the Anti-Corruption Network for Eastern Europe and Central Asia

The Anti-Corruption Network for Eastern Europe and Central Asia (ACN) is a regional outreach programme of the OECD Working Group on Bribery, established in 1998. It supports its participating jurisdictions in their efforts to prevent and combat corruption, through country reviews, practitioners' networks and country-specific technical assistance. Find out more at https://www.oecd.org/en/networks/anti-corruption-network-for-eastern-europe-and-central-asia.html.

Foreword

This follow-up monitoring report was prepared within the framework of the fifth round of monitoring of the Istanbul Anti-Corruption Action Plan (IAP), a sub-regional peer review programme of the OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN). Launched in 2003, the IAP has been supporting anti-corruption reforms in Armenia, Azerbaijan, Georgia,[1] Kazakhstan, Kyrgyzstan, Moldova, Mongolia, Tajikistan, Ukraine, and Uzbekistan through comprehensive and regular peer reviews. Montenegro and Bosnia and Herzegovina joined IAP in July 2025. Other jurisdictions of the ACN region, OECD member countries, international organisations, and non-governmental partners participate in implementing the IAP as experts and donors.

The ACN introduced a new indicator-based methodology for peer review for the IAP's fifth round of monitoring (2023-2026). After the pilot monitoring, the revised Assessment Framework (OECD, 2022[1]) and Guide (OECD, 2022[2]) were approved by the ACN Steering Group in November 2022. The IAP fifth round of monitoring baseline reports for Armenia, Azerbaijan, Moldova, and the Anti-Corruption Review of Ukraine[2] was adopted in 2023 (OECD[3]), and baseline reports for Kazakhstan, Kyrgyzstan, Mongolia, Tajikistan, and Uzbekistan in 2024 (OECD[4]).

Armenia joined the IAP in 2003 and underwent four rounds of monitoring. All previous IAP reports are available on the ACN website: https://www.oecd.org/en/networks/anti-corruption-network-for-eastern-europe-and-central-asia.html.

The monitoring team for the follow-up to the fifth round for Armenia included Mr Andrei Furdui (Romania), Mr Duro Sessa (Croatia), Mr Eduard Avetisyan (ADB), Mr Evgeny Smirnov (EBRD), Mr Michele Trianni (Italy), and Mr Renars Reiniks (Latvia). The ACN Secretariat was represented by Mr Andrii Kukharuk (Team Lead), Ms Natalia Baratashvili (Lead Analyst), Ms Zane Struberga and Ms Rysbek Kyzy Ranat (Administrative Assistants). The Ministry of Justice served as the National Co-ordinator of Armenia. Co-ordination was ensured by the following officials: Ms Anna Karapetyan (Deputy Minister of Justice), Ms Tatevik Khachatryan (Head of Monitoring Division of the Anti-Corruption Policy Development and Monitoring Department), Mr Yeprem Karapetyan (Head of the Anti-Corruption Policy Development and Monitoring Department), and Ms Tehmine Papoyan (Chief Specialist of the Monitoring Division of the Anti-Corruption Policy Development and Monitoring Department).

The assessment of Armenia was launched in November 2024. The National Co-ordinator provided replies to the questionnaire with supporting materials on 24 January 2025. The following nine non-governmental stakeholders submitted responses to the monitoring questionnaire: Center for International and Comparative Law, Armenian Lawyers Association, Corporate Governance Center, GIZ Armenia (Public Administration Reform Project), USAID Armenia Integrity Project, Transparency International Anticorruption Center, Protection of Rights Without Borders, Freedom of Information Center (FOICA) and a local expert. The physical on-site visit to Yerevan took place on 10-13 March and included 16 sessions with government and non-governmental representatives. The authorities and four non-governmental stakeholders provided comments on the draft report. Following two rounds of bilateral consultations, the follow-up monitoring report of Armenia was discussed and agreed at the ACN Plenary meeting on 8 July 2025.

The monitoring team expresses its sincere appreciation to the Armenian state authorities for their outstanding co-operation throughout the monitoring. In particular, the monitoring team commends the staff of the Ministry of Justice on their exceptional support. The monitoring team also extends its gratitude to representatives from other government agencies and non-governmental organisations for engaging in open and constructive dialogues during the country visit and subsequent bilateral consultations. The monitoring team is particularly grateful to Transparency International Armenia, the Corporate Governance Centre, and the United Nations Office in Armenia for their valuable contribution and assistance in organising the special sessions with non-governmental stakeholders during the onsite.

The monitoring of Armenia in 2025 was conducted with financial support from the European Union in collaboration with the European Bank for Reconstruction and Development (EBRD) and the Asian Development Bank (ADB).

Table of contents

FIGURES

INFOGRAPHICS

TABLES

Acronyms

ACC	Anti-Corruption Committee of Armenia
ACN	Anti-Corruption Network for Eastern Europe and Central Asia (OECD)
ADB	Asian Development Bank
AMD	Armenian dram
AMX	Armenia Securities Exchange
ANPP	Armenian Nuclear Power Plant *(selected for monitoring Armenian state-owned enterprise)*
CC	Criminal Code of Armenia
CGC	Corporate Governance Code of Armenia
COI	Conflict of interest
CPC	Corruption Prevention Commission
CSOs	Civil society organisation
EBRD	European Bank for Reconstruction and Development
ECtHR	European Court of Human Rights
EUR	Euro (currency)
HVEN	High Voltage Electric Networks *(selected for monitoring Armenian state-owned enterprise)*
HRD	Human Rights Defender's Office of Armenia
IAP	Istanbul Anti-Corruption Action Plan
LPA	Law on Public Procurement of Armenia
LPS	Public Service Law of Armenia
LWP	Law on Whistleblower Protection of Armenia
NGOs	Non-governmental organisations
OECD	Organisation for Economic Co-operation and Development
PA	Performance area
SJC	Supreme Judicial Council
SOE	State-owned enterprise
SGLMC	Surb Grigor Lusavorich Medical Center CJSC *(selected for monitoring Armenian state-owned enterprise)*
WTO GPA	Agreement on Government Procurement of the World Trade Organisation
Yerevan TPP	Yerevan Thermal Power Plant *(selected for monitoring Armenian state-owned enterprise)*

Methodology

The IAP fifth round of monitoring uses an indicator-based methodology to ensure higher objectivity, consistency, and transparency of peer reviews. The IAP fifth round of monitoring Assessment Framework and Guide derive from international standards and good practices based on a stocktake of the previous IAP monitoring rounds highlighting achievements and challenges in the region (OECD, 2020[5]). The indicators evaluate anti-corruption policy, prevention of corruption, and criminal liability for corruption, with a focus on practical application and enforcement, particularly at a high level. The IAP fifth round of monitoring is conducted biennially and includes one baseline report and one follow-up report for each monitored country.

In line with the fifth-round monitoring Assessment Framework, the report includes nine Performance Areas (PAs) with four indicators each and a set of benchmarks under each indicator. Benchmarks are further split into elements to ensure the granularity of the assessments and recognition of progress. The maximum possible score for a Performance Area is 100 points. Indicators under each Performance Area have an equal weight (25 points each). Benchmarks also have an equal weight within an indicator. The exact maximum possible number of points of a benchmark depends on the overall number of benchmarks included in the indicator (i.e. the total number of points for an indicator (25 points) divided by the total number of benchmarks within the respective indicator). Each benchmark and its elements (numbered as "A," "B," "C," "D," etc.) are scored individually by three different scoring methods. In case a benchmark or its element is "Not applicable" (N/A) in the follow-up report, this means no development and no change of baseline rating for that benchmark or its element. The performance level for each Performance Area is determined by aggregating the scores of all benchmarks within the respective Performance Area according to the scale below (Table 1). The scores of Performance Areas are not aggregated.

The present follow-up monitoring report assesses Armenia's performance in view of developments after the baseline reports by updating the report and relevant compliance ratings. The reporting period (same as the assessment period) for this follow-up monitoring report is 2023-2024.

Table 1. Scale of performance

PERFORMANCE LEVEL	A OUTSTANDING	B HIGH	C AVERAGE	D LOW
SCORE	76-100	51-75	26-50	<25

Executive summary

This follow-up monitoring report was prepared within the framework of the fifth round of monitoring of the Istanbul Anti-Corruption Action Plan (IAP). It evaluates anti-corruption reforms in Armenia against a set of indicators under nine performance areas focusing on anti-corruption policy, prevention of corruption, institutional framework and independence, as well as the enforcement practice. The report highlights developments that took place in the 2023-2024 assessment period following the baseline review in 2022.

Since 2022, Armenia has maintained a positive trajectory in anti-corruption reforms, marked by considerable legislative advancements and growing alignment with international standards and best practices. The country has demonstrated improved anti-corruption performance in six of nine performance areas, including policy development, asset disclosure, business integrity, public procurement and the enforcement of corruption offences. However, there has been a slight decline in performance in the independence of the judiciary and specialised anti-corruption bodies, and no progress was indicated with respect to the independence of the prosecution service. Armenia's aspirations for European integration are evidenced by the parliament's steps towards the European Union (EU) accession process. Within this context, the findings from the fifth round of monitoring will serve as sound insights to further inform and advance Armenia's anti-corruption reform agenda and priorities for progress in the years ahead.

Anti-Corruption Policy

The new Anti-Corruption Strategy and Action Plan draw on diverse sources, and its development was inclusive, engaging civil society. Regular monitoring indicates some progress in implementing planned activities in 2024. However, more comprehensive budgeting coupled with sustained political support remains crucial to ensure the timely implementation of new policy documents and delivery of tangible results.

Conflict of Interest and Asset Disclosure

Despite notable legislative advancements in the conflict-of-interest (COI) framework, routine enforcement of COI regulations remains insufficient. There is a need to develop practical guidelines, standardise disclosure forms, raise awareness and align internal procedures across institutions. Despite limited human and financial resources, the Corruption Prevention Commission plays a vital role in verifying asset and interest declarations. The automatic cross-checking of declarations against multiple state databases has considerably enhanced verification. While CPC's verification efforts are commendable, strengthening the use of risk-based analysis is encouraged to improve a regular verification process.

Protection of Whistleblowers

Some progress has been made to improve a legal framework for whistleblower protection but significant legislative gaps remain. Since the adoption of the Law on Whistleblower Protection in 2018, there have been no reported cases where protection measures were requested or granted. This demonstrates a critical lack of enforcement and the need for a comprehensive reassessment of the current system, including alignment with international standards. Although the Human Rights Defender's Office has been entrusted with the power to protect whistleblowers, it lacks dedicated staff to ensure the effective implementation of the law.

Business Integrity

Adopted in 2024, the Corporate Governance Code mandates boards of listed companies to oversee risk management, including corruption-related risks. However, enforcement remains weak as there is no clear authority responsible for monitoring compliance and no evidence of oversight in practice. Since 2023, companies have been required to disclose beneficial ownership information, yet the responsible agency does not routinely verify the data. The country lacks a dedicated business ombudsman. Compliance with corporate governance standards in state-owned enterprises remains low.

Public Procurement

The public procurement legal framework is comprehensive, encompassing procurement by state bodies, state-owned enterprises and utilities. Notable improvements include a sharp reduction in single-source contracts and increased competition in 2024. Continuous efforts to improve data transparency are commendable; however, the lack of machine-readable formats and the limited mandatory use of e-procurement hinders effective oversight. No sanctions for procurement-related corruption offences have been imposed. Gaps in procurement-related conflict-of-interest regulations, along with persistent nepotism concerns, remain unresolved.

Independence of the Judiciary

The Supreme Judicial Council plays a key role in judicial appointments, evaluations, training, and disciplinary matters. However, concerns about executive interference highlight the need to strengthen its institutional independence. The lack of justification in judicial appointments and promotions raises doubts about the transparency and merit-based nature of these processes. While progress has been made with the introduction of an appeal mechanism for disciplinary decisions, its implementation has faced significant delays. There is an urgent need to define the legal grounds for judicial disciplinary liability clearly and ensure that sanctions are proportionate, with dismissal applied only as a last resort.

Independence of Public Prosecution Office

The Public Prosecution Office operates as a separate entity. The procedures for the appointment and dismissal of the Prosecutor General require improvements. The selection and promotion of prosecutors are not fully transparent, competitive or merit based as there is extensive reliance on closed competitions among a select group of candidates in practice. The Prosecutor General retains significant and often decisive influence over appointments, promotions, discipline, and dismissals. Armenia has introduced into practice integrity checks of prosecutors that may trigger disciplinary action, which is commendable. As before, Armenia does not have any prosecutorial governance bodies and has no plans to establish such bodies.

Specialised Anti-Corruption Institutions

The Anti-Corruption Committee (ACC) is responsible for investigating corruption offences. The recent resignation of the ACC Chairman raised concerns about the institutional independence of the agency. A new head of the ACC was appointed in 2025. A specialised department within the Prosecutor General's Office prosecutes cases from the ACC. However, the selection process for the department’s head remains neither transparent nor competitive. The Prosecutor General retains the authority to alter ACC investigative jurisdiction in exceptional cases, though some legal grounds for doing so are insufficiently clear. The country also lacks a specialised agency or staff for asset recovery and management of seised and confiscated assets in corruption cases. The Department for Confiscation of Illicit Assets under the Prosecutor General’s Office actively targets illicit assets, although its mandate is confined to civil forfeiture.

Enforcement of Corruption Offences

The new Criminal Code has introduced important reforms, including new rules on the statute of limitations and liability of legal persons. Convictions for both active and passive bribery in the public sector have

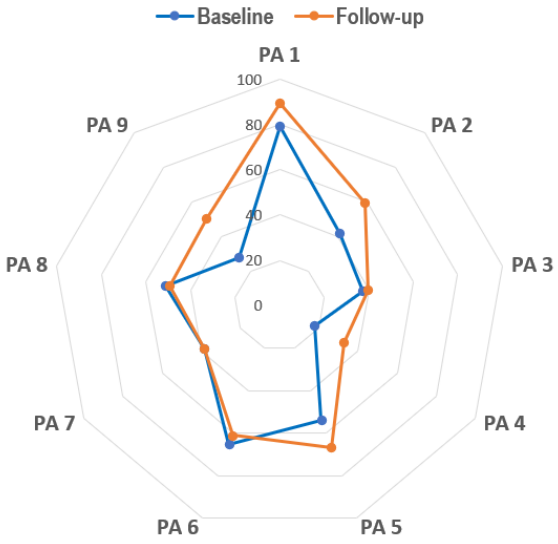
increased although convictions for trading in influence and private-sector bribery remain rare. A new civil forfeiture mechanism is actively used for the non-conviction-based confiscation of illicit assets. However, there have been no reported cases involving the confiscation of unexplained wealth or the recovery of corrupt assets from abroad. While Armenia routinely confiscates bribes as instrumentalities in active bribery cases, there are few examples of confiscating corruption proceeds or applying more advanced forfeiture measures. While Armenia investigates high-level corruption cases, conviction rates remain low, and some procedures for lifting official immunities have deficiencies.

Infographic 1. Overview of Armenia's anti-corruption performance

Armenia progressed in **6 out of 9** performance areas in 2023-24

Performance area (PA)	Baseline	Follow-up
PA 1. Anti-corruption policy	79.0	89.2
PA 2. Asset declarations	41.6	58.9
PA 3. Whistleblower protection	37.2	39.6
PA 4. Business integrity	18.1	32.7
PA 5. Public procurement	54.1	66.9
PA 6. Judiciary independence	65.3	61.1
PA 7. Prosecution service	38.1	38.1
PA 8. Anti-corruption institutions	51.0	49.3
PA 9. Enforcement of offences	27.7	50.1

Note: Performance is rated as outstanding (76–100), high (51–75), average (26–50), or low (<25).



Key achievements

- Adopted a coherent Anti-Corruption Strategy
- Improved the conflicts-of-interest regulatory framework
- Enhanced the asset declarations verification system
- Significantly decreased single-source public procurement contracts
- Introduced the liability of legal persons
- Developed a robust practice of civil forfeiture of illicit assets

Priority actions

- Implement robust verification of beneficial ownership information
- Strengthen safeguards for the autonomy of the Supreme Judicial Council
- Strengthen the whistleblower protection framework
- Enhance the transparency and competitiveness of recruitments and promotions in the prosecution service
- Ensure real institutional independence of the Anti-Corruption Committee

1 Anti-corruption policy

The timely adoption of the new Anti-Corruption Strategy and its Action Plan immediately following the expiration of previous strategy demonstrates the government's commitment to maintaining an up-to-date anti-corruption policy framework. Both documents are informed by diverse sources, with civil society actively engaged in their development. While there was some progress in implementing planned activities in 2024, sustained political support remains crucial to ensure the effective and timely implementation of anti-corruption policy measures. Additionally, the Strategy and Action Plan require more comprehensive and precise budgeting, ensuring the clarity of funds allocated for each activity to accelerate the pace of implementation and deliver tangible results. Despite resource constraints, the Anti-Corruption Secretariat has continued to play an essential role in co-ordinating with anti-corruption focal points and consistently monitoring and evaluating policy documents. The Evaluation Report of the previous Strategy and the alternative assessment conducted by civil society provided valuable insights and lessons for the new Anti-Corruption Strategy.

Figure 1.1. Performance level for anti-corruption policy is outstanding

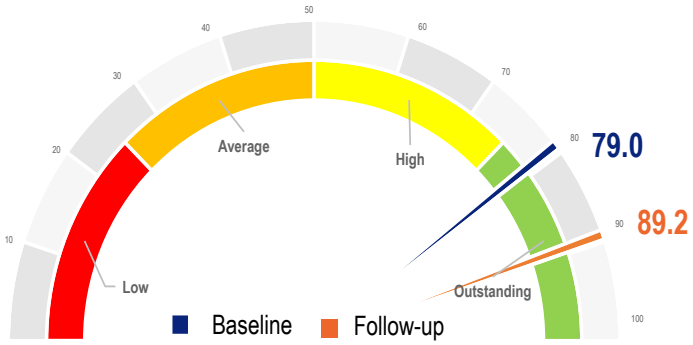
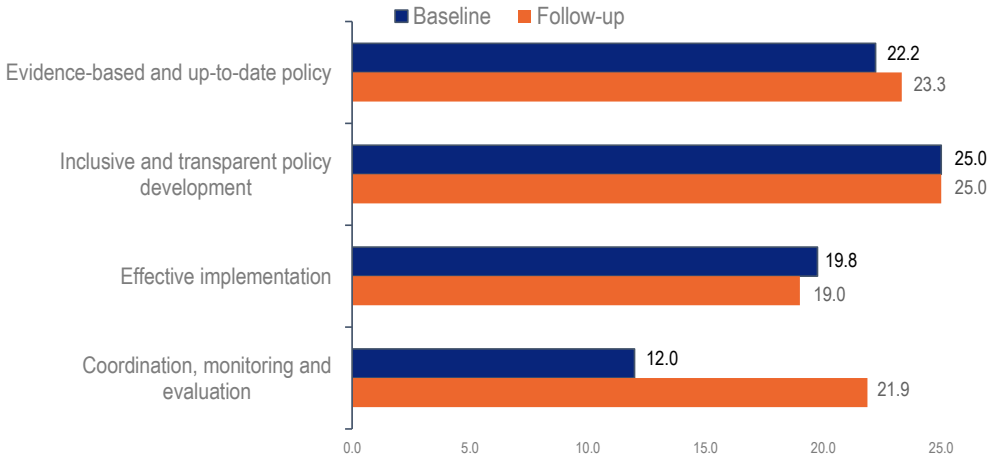


Figure 1.2. Performance level for anti-corruption policy by indicators



Indicator 1.1. The anti-corruption policy is evidence-based and up-to-date

Following the completion of the Anti-Corruption Strategy and its Action Plan 2019-2022 (also referred to below as new 'policy documents'), previously assessed by the IAP Fifth-Round Baseline Monitoring Report of Armenia (hereinafter "Baseline Monitoring Report") (OECD, 2024[6]), the Armenian Government adopted its fifth Anti-Corruption Strategy along with a corresponding Action Plan (2023-2026) on 26 October 2023 (Government of Armenia, 2023[7]).

The timely adoption of Armenia's 5th Anti-Corruption Strategy and its Action Plan after the previous 2019-2022 policy documents expired, clearly demonstrates the government's commitment to maintaining an up-to-date and relevant anti-corruption policy framework. Structured around five strategic directions, the new Strategy and 2023-2026 Action Plan are supported by various sources, including reports by public agencies (e.g. Corruption Prevention Commission or Prosecutor General's Office), assessments of local and international organisations (e.g. OECD and GRECO), and statistical data. The Anti-Corruption Strategy also provides a broader context for planned anti-corruption efforts by incorporating selected survey results and global indexes (e.g. Corruption Perception Index and Eastern Partnership Index). However, the Strategy and Action Plan could benefit from a more structured approach to selecting the most acute corruption problems and identifying priority actions based on urgency and potential for

expected impact. Furthermore, there is a need for more comprehensive and precise budgeting so that the required funds are adequately allocated to implement the Strategy and Action Plan successfully.

Benchmark 1.1.1.

The following evidence has been used for developing objectives and measures of the policy documents, as reflected in the policy documents or their supporting materials:

Element	Compliance	
	Baseline	Follow up
A. Analysis of the implementation of the previous policy documents (if they existed) or analysis of the corruption situation in the country	✓	✓
B. National or sectoral corruption risk assessments	X	X
C. Reports by state institutions, such as an anti-corruption agency, supreme audit institution, and law enforcement bodies	X	✓
D. Research, analysis, or assessments by non-governmental stakeholders, including international organisations	✓	✓
E. General population, business, employee, expert, or other surveys	✓	✓
F. Administrative or judicial statistics	✓	✓

While maintaining the approach of leveraging various sources (OECD, 2024[6]), the new Anti-Corruption Strategy and its Action Plan (2023-2026) rely on a sound and diverse evidence base. Chapter 1 of the Strategy presents a brief stocktake of the previous policy documents' achievements and lists a few areas requiring further enhancement as identified by the Evaluation Report of the previous anti-corruption strategy (Ministry of Justice, 2023[8]). Besides, prior to setting new objectives, the Strategy provides a concise summary on the implementation of the previous policy document (2019-2022). This analysis is sufficient for compliance with element A, although the monitoring team believes the Strategy should reflect more thoroughly and explicitly the lessons learned from the previous policy document implementation. As confirmed by the Armenian government, no risk assessment has been conducted to identify corruption risks or their factors (element B).

The new Strategy and Action Plan draw on state institution reports, including annual reports of the Corruption Prevention Commission or the Anti-Corruption Committee, thereby complying with the requirements of element C. The Ministry of Justice, functioning as the Anti-Corruption Secretariat (Benchmark 1.4.1), references additional analytical reports from state bodies, although the Strategy cites only a few such sources.

The new Strategy and Action Plan clearly incorporates outstanding international commitments and recommendations from organisations such as the OECD or the Council of Europe's Group of States against Corruption although there is only limited reference to civil society opinions in the narrative of the policy document (with no explicit reference thereto) (element D). The new Strategy and Action Plan also rely on insights from various international indices (element E), such as the Corruption Perception Index and Eastern Partnership Index, providing a broader context for the set objectives. Key findings of several surveys conducted by public authorities and several non-governmental organisations were also included. Many impact and outcome indicators linked to the objectives are formulated using administrative data produced by governmental agencies, providing a reliable basis for measuring the progress and effectiveness of the planned anti-corruption initiatives (e.g. data on the number of whistleblower reports, asset declarations, confiscation measures, criminal proceedings, etc.) (element F).

Overall, the variety of sources indicates a strong foundation for identifying challenges and areas for improvement. However, the monitoring team believes the new Strategy and Action Plan could benefit from a more focused risk-based perspective in setting strategic objectives, including analysing existing challenges and their specific causes to thoroughly identify the most acute problems and define priority actions within the defined policy circle. The feedback from non-governmental stakeholders encompasses both positive and negative aspects. On the positive side, participants expressed satisfaction with the increased quality of the new strategic document compared to the previous strategy. However, several representatives raised concerns regarding the rationale for choosing specific actions or priority areas and a potential impact of selected actions in achieving the intended goals.

Benchmark 1.1.2.

Element	Compliance	
	Baseline	Follow up
The action plan is adopted or amended at least every three years.	✓	✓

The Anti-Corruption Action Plan (2023-2026) was approved on 26 October 2023, meeting the benchmark requirement for adopting or updating an action plan within three years.

Benchmark 1.1.3.

Policy documents include:

Element	Compliance	
	Baseline	Follow up
A. Objectives, measures with implementation deadlines, and responsible agencies	✓	✓
B. Outcome indicators	✓	✓
C. Impact indicators	✓	✓
D. Estimated budget	✓	X
E. Source of funding	✓	✓

The structure of the new Anti-Corruption Strategy and Action Plan meets benchmark requirements. Notably, five broadly formulated goals cascade down to objectives (element A) and further break down into outcomes; annual performance targets and actions/outputs; outcome indicators and their baselines; verification sources; and implementing and co-implementing agencies (element B).

The Action Plan includes a range of medium- and long-term impact indicators assessing the causal effect of objectives in the policy circle. The latter includes an increase in the number of commercial organisations applying the new Corporate Governance Code or an increase in citizens' level of trust in public procurement processes. Thus, the country complies with element C.

The monitoring team welcomes the government's efforts to connect the objectives to the problems identified throughout the problem analysis stage and the level of clarity and detail provided in the policy documents. At the same time, the monitoring team observes that while the Strategy and Action Plan have multiple layers of objectives, some should be more clearly linked to each other and to respective result

indicators to provide a better picture of the reforms and impact envisaged. The monitoring team also had questions regarding problem prioritisation conducted in the policy drafting process – in particular, whether the authorities managed to effectively rank challenges and corruption risks based on urgency and identify the most pertinent problems and risks. Second, in a few cases, the choice and sequence of the planned actions were not entirely clear. The question of whether the selected actions could effectively feed into and correspond to the established goals was also raised by the monitoring team. Section IV of the Government Decision on Approving the Anti-Corruption Strategy (2023-2026) outlines funding sources (either government budget or donor support), thereby complying with element E.

However, the policy documents provide an estimated budget for only 48-50% of the objectives requiring additional funding. Thus, the Strategy omits crucial information about funds from the responsible agencies' regular operational budget, accounting for around 52% of all objectives. Given the limited scope of budget estimates provided and the extensive range of activities without estimated costs, the monitoring team expresses serious concerns about the uncertainty and potential underestimation of total resources required to fully implement the Anti-Corruption Strategy and its Action Plan.

This concern is further corroborated by the findings of the final Evaluation Report of the Anti-Corruption Strategy (2019-2022), which explicitly cites lack of resources as one of the factors impeding the implementation of the predecessor policy document. Non-governmental stakeholders have also echoed these concerns, emphasising that overreliance on donor funding could further diminish ownership among public agencies and negatively impact overall implementation levels.

In light of this, the monitoring team believes that the country is not compliant with element D. It notes that a comprehensive and realistic financial plan (as part of the policy document or separately) should be developed, facilitating adequate allocation of resources and continuous monitoring in the current policy cycle (see Benchmark 1.4.2).

Indicator 1.2. The anti-corruption policy development is inclusive and transparent

The Law on Normative Legal Acts of Armenia (Chapter 2) (2018[9]) and Government Decision N1146 set out rules for public consultations. The Law establishes a mandatory 15-day requirement for public consultation. It also foresees requirements for types of public consultations, their format, and communication channels, as well as an obligation to publish drafts online and provide public feedback on the received input. Each agency should publish draft legal acts and a summary of consultations with a list of participants on its website and a centralised public consultation – the Platform for the Publication of Legal Acts of Armenia (see Box 1.1).

The Government of Armenia ensured inclusive and transparent public policy engagement during the follow-up assessment period. The Anti-Corruption Strategy and Action Plan underwent extensive public and inter-governmental consultation. The draft documents were published on the centralised public consultation portal, offering comprehensive features to facilitate stakeholder engagement. The public consultation process was characterised by active participation from civil society, with most non-governmental stakeholders praising the high level of co-operation and transparency. The dedicated portal publicly displays 177 comments submitted (by six CSOs – Transparency International Armenia, Democracy Development Foundation, Law Development and Protection Foundation, Protection of Rights without Borders, Center for Economic Rights and Armenian Lawyers Association) during the public consultation, underscoring the government’s commitment to transparency and meaningful stakeholder involvement in policy development. Following the adoption, the Strategy and Action Plan were made accessible on the Ministry of Justice's website and an official Register of Armenian legislation.

Benchmark 1.2.1.

The following is published online:

Element	Compliance	
	Baseline	Follow up
A. Drafts of policy documents	✓	✓
B. Adopted policy documents	✓	✓

The Ministry of Justice published draft policy documents on the centralised public consultation platform on 13 July 2023, adhering to the rules on public consultation regarding all legal acts, including policy documents set by the Law on Normative Legal Acts of Armenia (Chapter 2, Articles 3-4) and Government Decision No. 1146 (2023[10]). Following a rigorous consultation process, the Government of Armenia adopted the Anti-Corruption Strategy (Annex 1) and two additional Annexes – an Action Plan and a Financial Estimate for the Action Plan. The policy documents were published on the official Register of Armenian legislation (2023[11]) and the official website of the Ministry of Justice. The adopted documents were disseminated through social and mass media outlets.

Benchmark 1.2.2.

Public consultations are held on draft policy documents:

Element	Compliance	
	Baseline	Follow up
A. With sufficient time for feedback (no less than two weeks after publication)	✓	✓
B. Before adoption, the government explains the comments that have not been included	✓	✓
C. An explanation of the comments that have not been included is published online	✓	✓

The highly consultative and inclusive public consultation process organised by Armenian authorities fully complies with all three elements of the benchmark. The working process began on 14 February 2023 by establishing a dedicated working group comprising representatives from 17 state bodies, anti-corruption specialists, and seven non-governmental organisations. From March to May 2023, the working group conducted 13 online and 10 in-person meetings. The mandatory use of the centralised public consultation platform significantly enhanced the transparency of the process and facilitated the involvement of a more diverse range of stakeholders in shaping the draft documents.

The first draft Strategy and Action Plan underwent public consultations from 13 July to 21 August 2023 (element A). The authorities documented more than 177 comments from civil society during that period. The responses from state authorities to received comments explaining the rationale for not accepting or partially accepting submitted suggestions were published on the eGovernment website (elements B and C) (2023[12]). Authorities note that of 177 comments, 75 were fully accepted, 54 were accepted with

modifications, and 48 were rejected. The dedicated public consultation platform does not list the government's responses, which civil society assesses as a deficiency.

Overall, non-governmental stakeholders positively evaluated the intensive collaboration with the working group members and other selected stakeholders, noting that the final document incorporated many recommendations from civil society. Some organisations further add that the selected approach demonstrates the government's willingness to engage with civil society and reflects a collaborative effort that balances governmental priorities with input from non-governmental stakeholders. However, considering that only 11 comments/opinions were provided by the general public through the dedicated public consultation platform, some stakeholders suggest engaging the public and the business sector more effectively.

Indicator 1.3. The anti-corruption policy is effectively implemented

Section III of the Anti-Corruption Strategy foresees a monitoring and evaluation mechanism. The Ministry of Justice conducts monitoring on a semi-annual and annual basis. The recent Monitoring Report 2024, published on 31 March 2025, shows that only 52% of measures were fully implemented. While some progress was achieved in 2024, the average implementation rate indicates a need for maintaining continuous political support to create pressure for effective policy implementation.

Benchmark 1.3.1.

Element	Compliance	
	Baseline	Follow up
Measures planned for the previous year were fully implemented according to the government reports	58%	52%

Note: The country's score for this benchmark will equal the percentage of measures planned for the respective year that were fully implemented, according to the government reports (scoring method 3). For example, if 70% of the measures planned for the previous year were fully implemented, the country would receive 70% of the maximum score possible under this benchmark.

The Monitoring Report 2024 reveals a relatively low level of progress in implementing the Action Plan (2023-2026). Of the 69 activities foreseen for 2024, 52% (36 activities) were fully implemented, 46% (32 activities) were partly implemented, and 1.4% (one activity) was not implemented. The Baseline Monitoring Report attributes incomplete implementation to several factors, primarily inadequate implementation timelines and resource constraints.

As noted by the government, another key challenge was the disproportionate allocation of measures across the implementation years, which affected the overall balance and efficiency of the reform process. Notably, a substantial portion of the Action Plan activities was allocated to the year 2024. Of the total 83 planned activities, 69 were scheduled for implementation specifically in 2024, with 11 of these measures designated for full completion within the same year. During the onsite visit, authorities acknowledged the ambitious nature of the Action Plan, which requires substantial resources, making it challenging to implement some activities within the defined timeframe. In 2025, civil society conducted alternative monitoring of the Strategy and Action Plan implementation in 2024 although, according to the government, a different methodology was used. According to the alternative assessment, 21 out of 69 (30%) activities (measures) were implemented in 2024. Non-governmental stakeholders highlighted the importance of strengthening and consolidating strong political will as a key solution to address the challenges in implementation.

Benchmark 1.3.2.

Element	Compliance	
	Baseline	Follow up
Anti-corruption measures unimplemented due to the lack of funds do not exceed 10% of all measures planned for the reporting period.	✓	✓

According to the Monitoring and Evaluation Report 2024, only one measure out of 69 was not implemented due to a lack of funds, which is less than 10% of the benchmark's requirement. Thus, the country is compliant with the benchmark.

Indicator 1.4. Co-ordination, monitoring, and evaluation of anti-corruption policy is ensured

There have been no changes in the anti-corruption policy co-ordination set-up since the Baseline Monitoring Report (OECD, 2024[6]). The Monitoring Division within the Anti-Corruption Policy Development and Monitoring Department (hereinafter “Anti-Corruption Department”) of the Ministry of Justice continues to serve as a Secretariat to the Anti-Corruption Policy Council. Its responsibilities include co-ordinating, monitoring, and evaluating the anti-corruption policy documents. The Secretariat published the Final Evaluation Report of the previous Anti-Corruption Strategy in 2023 and is leading the new anti-corruption policy development.

As of December 2024, the Secretariat (Monitoring Division) continues to face staffing shortages, echoing concerns raised in the Baseline Monitoring Report. Despite these resource constraints, the Secretariat continued co-ordinating with anti-corruption focal points, and monitoring and evaluating the policy documents. An impact indicator-based Evaluation Report of the previous Anti-Corruption Strategy (2019-2022), published in 2023, informed the problem analysis stage for the new Anti-Corruption Strategy. Armenia's commitment to inclusive policymaking is demonstrated in its collaborative approach with non-governmental stakeholders. The latter also extends to encouraging contributions to monitoring and evaluation reports, and supporting civil society's development of alternative reports, including an alternative monitoring report.

Benchmark 1.4.1.

Co-ordination and monitoring functions are ensured:

Element	Compliance	
	Baseline	Follow up
A. Co-ordination and monitoring functions are assigned to dedicated staff (secretariat) at the central level by a normative act, and the staff is in place	✓	✓
B. The dedicated staff (secretariat) has the power to request and obtain information, to require participation in the convened co-ordination meetings, and to require submission of the reports of implementation	X	✓
C. Dedicated staff (secretariat) have the resources necessary to conduct their respective functions	X	X
D. Dedicated staff (secretariat) routinely provides implementing agencies with methodological guidance or practical advice to support policy implementation	✓	✓

Government Decision 1332-N, which entrusts anti-corruption policy development, co-ordination, and monitoring functions to the Anti-Corruption Department, has not been changed since the Baseline Monitoring Report. The Department's Monitoring Division exclusively focuses on co-ordinating policy implementation, monitoring, and evaluation, as well as supporting the Anti-Corruption Policy Council. Thus, the country remains compliant with element A. In the Baseline Monitoring Report, Armenia was considered not compliant with element B due to limited powers and element C due to the respective Division's insufficient human resources.

The new amendments introduced in January 2023 to the Law on Public Service (Article 46.3) delineate the functions and powers of the Anti-Corruption Department, thus successfully addressing a previous non-compliance issue. Currently, the functions of the Anti-Corruption Department and its respective Monitoring Division include providing methodological assistance and advice to implementing agencies, requesting and receiving information and documents, submitting proposals, and recommending implementing international commitments. The country is now compliant with element B.

However, it is important to note that the issue of insufficient human resources (element C) stressed by the Baseline Monitoring Report has not yet been addressed. As of December 2024, the Monitoring Division had only two officials, which is down from the assessment in 2022 when the Division had three officials. The authorities claim that two employees from the Anti-Corruption Policy Division have been engaged in supporting the Monitoring Division. However, this conclusion has not been substantiated with supporting evidence such as changes to job descriptions or other relevant steps to demonstrate that the Division now has sufficient human resources. The country remains non-compliant with element C.

In 2024, the Secretariat strengthened anti-corruption co-ordination by providing regular methodological support to responsible agencies (element D). These efforts included a targeted training programme in May 2024 for anti-corruption focal points to enhance awareness of their tasks and elaboration of a detailed guide further clarifying these responsibilities. The Division also confirms its ongoing support to focal points in facilitating the submission of semi-annual and annual self-assessment monitoring reports and co-operation with international organisations.

Overall, the monitoring team welcomes improvements in clarifying the Anti-Corruption Department's functions, powers, and co-ordination quality. However, given the extensive number of stakeholders and frequency of monitoring, steps should be taken to increase in human resources within the dedicated Division.

Benchmark 1.4.2.

Monitoring of policy implementation is ensured in practice:

Element	Compliance	
	Baseline	Follow-up
A. A monitoring report is prepared once a year	✓	✓
B. A monitoring report is based on outcome indicators	✓	✓
C. A monitoring report includes information on the amount of funding spent to implement policy measures	x	x
D. A monitoring report is published online	✓	✓

According to the Anti-Corruption Strategy, the Monitoring Division (Secretariat) conducts monitoring on a semi-annual and annual basis. The implementing agencies submit annual self-assessment reports within ten working days after the end of each year, followed by the Secretariat's data analysis and preparation of monitoring reports. The Monitoring Division has prepared changes to the format of monitoring reports, aiming to demonstrate an analysis of implementation per specific actions/outputs and outcomes, a summary of the overall implementation, and a dedicated section with civil society's views. The government notes that the Monitoring Report 2024 was prepared in accordance with the revised format, incorporating alternative assessments by civil society (e.g. measures 4.3 and 5.1 of the Monitoring Report) as well as in the "Enhancement of Anti-Corruption Monitoring and Evaluation Frameworks" section of the report. During the follow-up assessment period, the Secretariat also prepared and published a semi-annual monitoring report for the first half of 2024.

The Monitoring Division developed and published the latest annual Monitoring Report on 31 March, thereby complying with elements A and D (2025[13]). The document draws from three primary data sources: self-assessment reports by implementing agencies, recommendations or evaluations from international organisations, and input from non-governmental stakeholders. The report closely follows the structure of the policy documents. It describes progress in relation to 2024 performance targets, outcomes, and indicators (element B). However, similarly to the findings in the Baseline Monitoring Report, information about budget expenses concerning implementation in monitoring reports remains unavailable (element C). The monitoring team reiterates that the lack of such information may negatively impact the capacity to link actual performance to set strategic objectives and manage budgetary spending accurately and transparently. The Ministry of Justice has noted that starting from the first semester of 2025, state agencies will use a revised reporting format, requiring separate disclosure of state and donor funding. To support implementation of this new feature in the reporting mechanism, a two-day training session was held for anti-corruption officers from state and local government bodies.

Benchmark 1.4.3.

Evaluation of the policy implementation is ensured in practice:

Element	Compliance	
	Baseline	Follow-up
A. An evaluation report is prepared at least at the end of each policy cycle	X	✓
B. An evaluation report is based on impact indicators	X	✓
C. An evaluation report is published online	X	✓

According to the Assessment Framework, monitored countries are expected to evaluate previous policy documents, i.e. those preceding the policies in force at the time of assessment. Armenia adhered to this standard by developing and publishing its Evaluation Report for the 2019-2022 Anti-Corruption Strategy in October 2023 (elements A and C) (2023[14]). The document thoroughly assesses the effectiveness of implemented measures and the progress achieved against impact indicators. Unlike monitoring reports, the Evaluation Report explicitly focuses on comparing achieved progress against defined impact indicators and illustrates changes over the four-year period (element B).

The Evaluation Report also yielded insights and valuable recommendations for the new strategy. For instance, a notable decrease in the number of whistleblower notifications in the previous policy cycle led to new objectives and impact indicators that focus on raising awareness and trust among whistleblowers. The Evaluation Report found that lack of resources (mainly concerning some activities of the Corruption Prevention Commission), delays in adopting specific legal acts by the National Assembly, and insufficient timeframes impeded implementation of previous policy documents.

Benchmark 1.4.4.

Non-governmental stakeholders are engaged in the monitoring and evaluation:

Element	Compliance	
	Baseline	Follow-up
A. Non-governmental stakeholders are invited to regular co-ordination meetings where the monitoring of the progress of the policy implementation is discussed	✓	✓
B. A monitoring report reflects written contributions of non-governmental stakeholders	✓	✓
C. An evaluation report reflects an assessment of the policy implementation conducted by non-governmental stakeholders	X	✓

Following the adoption of the new Anti-Corruption Strategy and Action Plan, a dedicated Anti-Corruption Working Group was established in 2024. The group serves multiple functions: providing a platform for co-operation among state and non-governmental stakeholders, overseeing monitoring, developing policy proposals, and recommending changes to policy documents. In addition to government agencies, its composition includes five non-governmental organisations (Helsinki Civil Assembly Office, Union of Informed Citizens, Transparency International Anticorruption Center, Armenian Lawyers' Association, and

Union of Manufacturers and Businessmen) who are also members of the Anti-Corruption Policy Council. In the follow-up reporting period, the Anti-Corruption Working Group met on 21 October 2024 to discuss the activities implemented during the first half of 2024 and targets set for the second half of 2024. In addition to the Working Group, the anti-corruption institutional set-up also includes a high-level co-ordination body, the Anti-Corruption Policy Council, chaired by the Prime Minister of Armenia, with the same five non-governmental organisations representing civil society. The Council convened three meetings in 2023-2024 (February 2023, October 2023, and February 2024) although civil society notes that the Council should convene at least one meeting per quarter.

Similarly to the predecessor strategy, the new anti-corruption policy documents recognise the crucial role of non-governmental sector engagement and encourage civil society organisations to develop alternative monitoring and evaluation reports. Both civil society and the authorities confirm that the recent Monitoring Report 2024 benefited from contributions from the Armenian Lawyers' Association and Transparency International Anticorruption Centre (element B).

As a part of the evaluation exercise, the Armenian Lawyers' Association, Europe in Law Association, and Union of Manufacturers and Businessmen of Armenia produced an alternative Evaluation Report of the previous Anti-Corruption Strategy in March 2023 in co-operation with the CSO Anti-Corruption Coalition. The report was based on information provided by implementing state bodies, monitoring reports developed by the Secretariat, as well as four focus group discussions that brought together representatives from state bodies, experts, and non-governmental stakeholders (2023[15]). Additional input from civil society organisations, in particular, from the Armenian Lawyers' Association and Transparency International Anti-Corruption Center, was also incorporated in the Final Evaluation Report developed by the Secretariat in 2023 (element C).

Box 1.1. Public consultation platform for inclusive stakeholder engagement

The Platform for the Publication of Draft Legal Acts of Armenia is a centralised website for public consultation on draft legal acts. The Platform ensures public participation in the law-making process, aiming to promote transparency and accountability. It also raises public awareness about the draft legal act and gathers public opinion. It offers a range of functionalities designed to engage stakeholders effectively. For example, users can access published drafts and supporting materials, track the revision and adoption process of legal acts, review suggestions submitted by other stakeholders, and, upon registration, share their own opinions. Additionally, users receive feedback on accepted comments and obtain explanations for proposals not incorporated, thus streamlining the consultation process and promoting transparency in Armenia's legislative development.

Source: Ministry of Justice of Armenia (2025[16]), Platform for Publication of Legal Acts, https://www.e-draft.am/en.

Assessment of non-governmental stakeholders

According to non-governmental organisations (NGOs) that responded to the questionnaire and were present during the onsite visit, developing new anti-corruption policy documents in Armenia was inclusive and participatory. Stakeholders reported a high intake of their suggestions in the draft document, although some expressed regret that certain areas, such as freedom of information and the health sector, were not comprehensively addressed in the Anti-Corruption Strategy. Civil society noted the government's evidence-based approach, with primary consideration given to recommendations from international organisations, insights from targeted surveys, and input from local NGOs. While the overall policy development process was positively assessed, non-governmental stakeholders raised concerns about

certain aspects of the design stage. Specifically, they pointed out that the rationale for some interventions lacked clarity regarding how they would address identified gaps and contribute to expected results. Implementation timelines were deemed too short in some cases, with an unclear sequence of actions. Some suggested establishing a regular, institutionalised system for collecting evidence, such as surveys, risk assessments, and focus groups, instead of relying on ad hoc or donor-driven efforts. A significant issue highlighted concerns about the absence of accurate resource estimates and linkage to the country's budget cycle. NGOs further added that the Action Plan predominantly focuses on legal changes, with little attention given to practical implementation. This potentially limits the impact in terms of the goals set by the policy documents. These concerns were identified in areas such as whistleblower protection and enforcement of conflict-of-interest regulations in the public sector.

Several NGOs commended the quality of co-operation with civil society. However, they noted that the Secretariat's limited resources and high staff turnover remain challenges. While respondents reported active participation in monitoring and evaluation processes, they suggested further enhancements to the methodology to better align with the current structure of policy documents. Some stakeholders recommended a regular update of information on anti-corruption performance, including the dedicated Anti-Corruption Monitoring Platform (https://anti-corruption.gov.am/am/). Several civil society organisations criticised the Strategy's explicit focus on legal changes, with a limited focus on practical measures. A low implementation rate was also underlined as one of the key challenges. Alternative assessments conducted by civil society showed that the authorities implemented 21 out of 69 activities. A few stakeholders perceived a decline in the government's commitment to anti-corruption efforts due to the Anti-Corruption Policy Council’s decreased level of activity in relation to that of previous years. They also believed that implementation in 2024 lacked political backing. These concerns prompted suggestions for increased ownership over anti-corruption commitments and the introduction of parliamentary oversight.

2 Conflict of interest and asset declarations

The amendments to the Law on Public Service significantly strengthened the conflict-of-interest (COI) framework by expanding the COI concept and broadening the definition of affiliated persons. Despite these legislative improvements, enforcement of COI regulations remained weak. While the Corruption Prevention Commission (CPC) initiated several administrative proceedings for failures to report ad hoc COIs, there was a lack of routine enforcement for other violations. The findings also underscore a lack of effective enforcement among entities responsible for COI oversight, including ethics commissions and integrity officers. Despite significant human and financial resource constraints, the CPC plays a critical role in verifying asset and interest declarations. Accessibility was enhanced by publishing declaration data in machine-readable formats, and the platform now enables automatic cross-checking of data across several state databases. While there was a notable shift towards integrity checks of judicial and prosecutorial candidates, limited resources resulted in only 5% of annual declarations being subject to regular verification. The CPC is strongly encouraged to strengthen its use of risk-based analysis to improve the regular verification process.

Figure 2.1. Performance level for conflict of interest and asset declaration is high

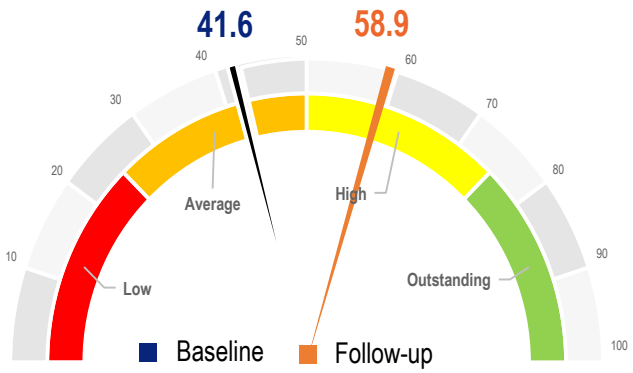
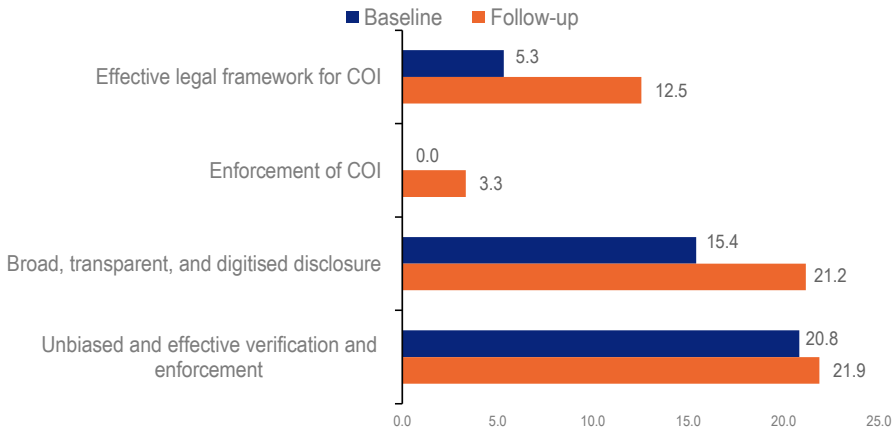


Figure 2.2. Performance level for conflict of interest and asset declaration by indicators



Indicator 2.1. An effective legal framework for managing conflict of interest is in place

The Law on Public Service of Armenia (LPS) sets out the normative and institutional framework for preventing, reporting, and resolving conflict of interest (COI) in public service (2018[17]). In 2023, the Baseline Monitoring Report (OECD, 2024[6]) recognised the need to further align the legislative provisions with international standards. Key gaps included a narrow definition of COI, private interest, and affiliated persons. There is also insufficient coverage of apparent and potential COI in the legislation. Furthermore, specific categories of public officials (e.g. members of government) did not have special COI regulations or existing provisions were considered insufficient during the baseline assessment.

In the follow-up assessment period, Armenia introduced a new set of amendments to the Law on Public Service of Armenia that harmonises specific COI provisions with international standards. The amendments of January 2023 included an expanded concept of COI, broadened the scope of affiliated persons, and introduced a new definition of "private interests". Additionally, several new COI resolution methods were also introduced. However, existing fragmentation of legal procedures applicable to various groups of public

officials (e.g. Members of Parliament, judges, local government representatives, prosecutors, investigators, etc.) sometimes leads to inconsistencies, including in implementing conflict-of-interest rules.

The Anti-Corruption Strategy (2023-2026) outlines plans to draft a Law on the Prevention of Corruption to strengthen the public integrity system, including regulations on conflict of interest, restrictions on accepting gifts, incompatibility requirements and post-employment restrictions. The monitoring team welcomes the legal reforms introduced so far and supports the planned steps to further enhance the framework for preventing and managing COI. However, as new legislative changes are developed, the authorities are also encouraged to focus on facilitating the enforcement of existing rules. This should include developing detailed guidelines with practical examples of managing COI situations across various groups of officials and outlining the methods for resolving such conflicts effectively. Additionally, assisting state agencies in aligning their internal rules and procedures with the overarching framework can foster greater compliance. Authorities are also advised to consider developing a standardised disclosure form that allows for detailed reporting across the public sector and enables responsible persons to make well-informed decisions. While the law already requires statistical data on COI violations, the monitoring team also recommends establishing rules for recording and storing information about disclosures and resolution measures applied. Finally, strengthening the capacities of responsible persons and raising awareness of public servants remain critical priorities for fostering a culture of integrity within the public sector (see Indicator 2.2 below).

Benchmark 2.1.1.

The legislation extends to and includes a definition of the following concepts applicable to public officials in line with international standards:

Element	Compliance	
	Baseline	Follow-up
A. Actual and potential conflict of interest	X	✓
B. Private interests that include any pecuniary and non-pecuniary advantage to the official, his or her family, close relatives, friends, other persons, or organisations with whom the official has personal, political, or other associations	X	✓
C. An apparent conflict of interest	X	X

During the baseline assessment period, the LPS included a narrow COI definition and lacked an apparent and potential conflict of interest (elements A and C). As well, the definition of “private interests” was considered limited as it concerned only “improvements of property” or “legal status” of an official or his/her affiliated person (element B).

In the follow-up assessment period, Armenia introduced several significant amendments addressing some of the shortcomings identified in the Baseline Monitoring Report. Namely, the COI definition was expanded to situations where the private interests of “a person holding a position” (i.e. a public servant) *influence* or *may influence* “an unbiased and objective performance of official duties” (Article 33, LPS). The amendments now encompass actual and potential COI, aligning with element A's requirement. Regarding element B, the legislative amendments significantly expanded the definition of “private interests” which currently incorporates “*any privilege*” received by an official or an affiliated person as well as persons or organisations with whom an official or affiliated persons have “*business, political, and other practical or private relations*” (Article 33, Part 2, LPS). Business relations are defined as any economic, business or transitional relations that lead or may lead to gaining benefits. On the other hand, political relations are related to “membership in a political party or other business or personal connections with members of that

party". The monitoring team welcomes the broader definition although it observes that the provision focuses on "direct or indirect advantage". In case of narrow interpretation, it could overlook certain conflict-of-interest situations, such as using one's position for personal retaliation that gives rise to a violation of citizens' rights or interests even if no benefit accrues to the officials or their affiliated persons.

Before the mentioned revisions, a definition of "affiliated persons" narrowly encompassed only a spouse, children, parents and grandparents, uncles, aunts and their children, sisters and brothers, and their spouses and children. Following the legal changes, the personal scope of Article 33 additionally extends to all persons tied with kinship and non-kin close personal relations with a public official, including persons living together, under the care or having common economic interests. Additionally, "affiliated persons" include organisations where a public official or his/her affiliated persons have direct or indirect control over more than half of the authorised capital or unit shares, as well as cases when they predetermine conditions of entrepreneurial activities or give bidding orders on behalf of organisations. Thus, Armenia is compliant with element B. The legislation, however, does not address apparent conflict of interest, leaving the country non-compliant with element C. That said, the government believes that apparent conflict of interest is indirectly addressed by the revised Article 33 (para. 6) of LPS. The provision states that a public official is allowed to "continue or resume the unbiased and objective performance of duties in the absence of a conflict of interest". Accordingly, in cases when no actual conflict exists (but only the appearance of one), the official may be advised to continue or resume the performance of their duties. As clarified by the authorities, the determination of whether a conflict of interest exists will be made on a case-by-case basis.

Benchmark 2.1.2.

The legislation assigns the following roles and responsibilities for preventing and managing ad hoc conflicts of interest:

Element	Compliance	
	Baseline	Follow-up
A. Duty of an official to report COI that emerged or may emerge	✓	✓
B. Duty of an official to abstain from decision-making until the COI is resolved	✓	✓
C. Duties of the managers and dedicated bodies/units to resolve COI reported or detected through other means	X	X

The Baseline Monitoring Report confirmed compliance with elements A and B. Under the LPS, officials must report COI that has emerged or may emerge (element A) and refrain from participating in decision-making until the COI is resolved (element B). Specifically, the disclosure procedure obliges an official to submit a written statement within 10 days to a superior or an immediate supervisor if circumstances *could lead* to COI during the performance of an action or adoption of a decision. Furthermore, the obligation to refrain from actions and decision-making in cases of ad hoc COI also extends to preparatory activities related to decision-making, such as drafting documents, organising discussions, and forming task forces that influence decision-making (Article 33, part. 5, LPS).

Regarding element C, the LPS imposes an obligation on a superior or an immediate supervisor of a public official who has submitted a written statement to take or propose measures to resolve the COI situation. However, the monitoring team notes that the law does not specify clear deadlines for resolving the issue, nor does it establish a requirement to consult or share relevant information with integrity officers. In cases where an official does not have a superior or immediate supervisor, a dedicated body – the Corruption Prevention Commission (CPC) – is tasked with recommending actions to address the COI. In relation to

the specialised body, the CPC, the law and the practice clearly shows (see Indicator 2 below) that in addition to self-reporting, the CPC has been active in initiating proceedings based on media publications, complaints from third parties or whistleblower reports, as well as verification of asset declarations. However, even though Armenia introduced legislative amendments to the LPS during the follow-up assessment period, these changes do not establish an explicit requirement for superior or immediate managers to resolve COI detected through means other than self-reporting by a public official, as earlier recommended by the Baseline Report. Thus, the country remains non-compliant with element C.

Benchmark 2.1.3.

The legislation provides for the following methods of resolving ad hoc conflicts of interest:

Element	Compliance	
	Baseline	Follow-up
A. Divestment or liquidation of the asset-related interest by the public official	X	X
B. Resignation of the public official from the conflicting private-capacity position or function, or removal of private interest in another way	X	X
C. Recusal of the public official from involvement in an affected decision-making process	X	✓
D. Restriction of the affected public official's access to particular information	X	✓
E. Transfer of the public official to duty in a non-conflicting position	X	X
F. Re-arrangement of the public official's duties and responsibilities	X	✓
G. Performance of duties under external supervision	X	X
H. Resignation/dismissal of the public official from their public office	X	X

During the baseline assessment period, Armenia did not meet any elements listed in the benchmark as the LPS included only a general requirement for supervisors to “take steps or suggest taking steps to resolve the [COI] situation”. In 2023, the legislative amendments to the LPS introduced more specific measures to address ad hoc conflicts of interest. These measures include refraining from performing an action or adopting a decision, including from involvement in the preparatory works aimed at making a decision (Article 33, Part 4) (element C); restricting official’s access to certain information (Article 33, Part 6(1)) (element D); assigning the power to consider and solve a matter to another official (Article 33, Part 6(2)); and limiting powers or scope of discretion of an official in question (Article 33, Part 6(4)) (element F). Additionally, the LPS provides for “setting a deadline for eliminating COI” (Article 33, Part 6(3)); however, this provision does not explicitly align with other elements of this benchmark. Thus, the amended LPS still lacks provisions for several methods of resolving COI specified by the benchmark, such as divestment or liquidation of the asset-related interest (element A); transferring a public official to duty in a non-conflicting position (element E); performing duties under external supervision (element G); resignation from conflicting private-capacity position (element B); and dismissal of a public official (element H).

Benchmark 2.1.4.

The legislation provides for the following methods of resolving ad hoc conflicts of interest:

Element	Compliance	
	Baseline	Follow-up
A. Specific methods for resolving conflicts of interest in collegiate (collective) state bodies	X	X
B. Specific methods for resolving conflicts of interest for top officials who have no direct superiors	X	X

The Baseline Monitoring Report concluded that Armenia was non-compliant with both elements of this benchmark as the LPS did not establish specific methods of resolving COI within collegiate state bodies. Only a limited number of collegiate bodies, such as the Supreme Judicial Council or the Corruption Prevention Commission, had respective provisions in their governing acts.

Although legislative amendments to the LPS were introduced in 2023, the legislation still lacks a comprehensive general framework for resolving COI in collegiate state bodies. It is noteworthy that one of the new COI resolution methods introduced in 2023 requires members of collegiate bodies to "refrain from decision-making". However, the resolution methods listed in Article 33, Part 6(5) of the LPS explicitly apply to situations where a member of a collegiate body has a supervisor or immediate supervisor – an arrangement that does not consistently apply to independent collegiate state bodies. Thus, the country remains non-compliant with element A.

Similarly, no significant progress was made toward compliance with element B during the 2023-2024 period. For officials without supervisors or those holding high-level state positions (e.g. President, Prime Minister, government members or heads of autonomous bodies), the disclosure process involves submitting a written statement to the CPC in case of COI (Article 33, Part 7, LPS). The CPC is tasked with issuing an opinion on steps to resolve the situation within three days, which may include confirming the presence or absence of COI. Based on this opinion, the official must prepare and publish a public clarification on the agency's website within three days. The Law on Corruption Prevention Commission notes that "the Commission may also propose to take steps aimed at neutralising the consequences of the violation or the situation" (2017[18]). Authorities note that in practice, the CPC, depending on the situation, could propose practically any solution to resolve the emerged COI and examples of the CPC requesting an official in question to restrain from related decision-making in addition to disclosing the of the conflict of interest were provided. However, the monitoring team notes that the Law on Corruption Prevention does not specify concrete resolution mechanisms that the CPC can employ. Besides, as noted above, the esolution methods provided by Article 33 of the LPS apply only to officials with supervisors. Thus, Armenia remains non-compliant with element B.

Benchmark 2.1.5.

There are special conflict-of-interest regulations or official guidelines for:

Element	Compliance	
	Baseline	Follow-up
A. Judges	✓	✓
B. Prosecutors	X	✓
C. Members of Parliament	✓	✓
D. Members of Government	X	X
E. Members of local and regional representative bodies (councils)	X	✓

To comply with this benchmark, special regulations or tailored rules addressing COI situations among categories of officials are essential. The Baseline Monitoring Report concluded that the Judicial Code and Law of the Constitutional Court of Armenia provide detailed special norms for preventing and resolving COI situations among judges (element A). Several provisions of the LPS introduced in 2023 were extended to include judges through changes to the Judicial Code, including a new definition of COI and private interests, establishing a duty to report COI, and abstaining from certain actions (inaction), decision-making, and preparations for decision-making. The Baseline Monitoring Report also confirmed compliance with element C. Both the Law on Rules of the National Assembly and the Law on the Performance Guarantees of the National Assembly Members (Members of Parliament/MPs) include provisions defining COI and private interests, outlining procedures for declaring COI and requiring MPs to abstain from voting. However, the monitoring team reiterates its recommendations to address identified gaps, such as better aligning special regulations for MPs with the overarching framework set by the LPS and clarifying available sanctions. Thus, during the baseline assessment period, the country was not compliant with three elements (B, D-E).

Prosecutors (element B): According to the assessment of the Baseline Monitoring Report, the Law on Prosecution Service and Order No. 27 of the Prosecutor General initially did not provide a COI definition and referred only to a general obligation of refraining from COI (2017[19]). However, with legislative amendments in 2023, the Law on the Prosecutor's Office (Article 74.1) requires prosecutors to avoid "situations outlined in Article 33 of the LPS". It mandates immediate written notifications to the Prosecutor General if such situations arise. These amendments also extend key LPS provisions, including an expanded definition of COI, private interest, and affiliated persons. The Law on Prosecution Service further obliges prosecutors to minimise instances necessitating "removal from proceedings" (Article 73, Part 1(11)) and establishes an obligation for recusal or self-recusal in cases of COI. In self-recusal cases, an immediate superior prosecutor is authorised to transfer criminal proceedings to another prosecutor or assume responsibility for them (Article 32, Part 7(2) and Part 8(2)). Violations of COI regulations can lead to disciplinary liability against a prosecutor under Article 55, Part 1(2) of the Law on Prosecution Service. The Law establishes similar provisions in relation to the Investigative Committee and the Law on the Anti-Corruption Committee. Moreover, rules on recusal and self-recusal are also reinforced by the Criminal Procedure Code, which applies similar requirements to prosecutors as those for judges. The monitoring team welcomes these amendments that seem to comply with the element, and thus, the country is considered compliant with element B.

Members of Government (element D): On 6 February 2024, the Corruption Prevention Commission adopted a Code of Conduct for individuals holding state positions, which includes members of government (2024[20]). The Code defines COI as situations where the "private interests of a person holding a public

position affect or may affect the impartial and objective performance of his or her official (service) duties". Chapter 3 of the Code of Conduct (Management of Conflict of Interest) stipulates that state officials must comply with obligations set by Article 33 (Part 4) of the LPS. This obligation includes avoiding conflicts of interest, refraining from actions or decisions that lead to such conflicts, and abstaining from actions/decisions, including involvement in the decision-making process, when a conflict exists. The Corruption Prevention Commission is tasked with reviewing COI disclosure statements of state officials and initiating proceedings under Article 27 of the Law on the Corruption Prevention Commission (LCPC) in case of violations. However, neither the Code nor the Law on Corruption Prevention clearly defines specific methods for resolving and managing emerged COI. The country is non-compliant with element D.

Members of local and regional representative bodies (element E): From 2023, members of community councils are subject to the Law on Self-Governance and the Law on Self-Governance of Yerevan. Following the recent amendments to the LPS, the definition of the COI outlined in Article 33 of the LPS has been extended to include members of community councils (Article 21.1, Law on Local Self-Government). Under these provisions, a community council member must abstain from voting in cases of COI and immediately notify the council or the head of the community in writing. Armenia is compliant with element E.

The monitoring team reiterates that to ensure the effective implementation of the revised legal framework across the public service, the authorities are encouraged to facilitate the alignment of special legislation with a general framework set by the LPS to the extent possible. Additionally, creating guidance on applying the rules and supporting responsible agencies in developing more detailed (internal) organisational procedures aligned with general principles is crucial.

Indicator 2.2. Regulations on conflict of interest are appropriately enforced

The Law on Public Service establishes disciplinary sanctions for "actions or decisions made in situations of COI" (Article 33, Part 9). In 2023, the legal framework was further strengthened by introducing administrative liability for public officials without supervisors or persons holding political positions (state officials) for failure to submit a written statement in conflict-of-interest situations.

Despite these legislative changes, the enforcement of COI regulations remained weak in 2023-2024. The Corruption Prevention Commission initiated several administrative proceedings against state officials for not reporting an ad hoc conflict of interest in 2024. However, there was no routine enforcement (i.e. at least three cases where sanctions were imposed) for violations related to restrictions on gifts or hospitality, breaches of incompatibility rules, a failure to meet requirements for divesting ownership rights in commercial entities or violations of post-employment restrictions. There is also limited information on how various entities responsible for overseeing COI compliance, such as ethics commissions, integrity officers or immediate managers, have contributed to COI prevention, management, and resolution in the public sector. Additionally, the legal framework still lacks provisions for revoking decisions or contracts due to COI violations and mechanisms for suspending or terminating employment or other contracts in cases of breaches of post-employment restrictions.

Benchmark 2.2.1.

Sanctions are routinely imposed on public officials for the following violations:

Element	Compliance	
	Baseline	Follow-up
A. Failure to report an ad hoc conflict of interest	X	✓
B. Failure to resolve an ad hoc conflict of interest	X	X
C. Violation of restrictions related to gifts or hospitality	X	X
D. Violation of incompatibilities	X	X
E. Violation of post-employment restrictions	X	X

Ethics commissions established under each state and local governance body are authorised to address violations related to incompatibility requirements, rules of conduct, and conflicts of interest among public servants. Following an internal investigation, these commissions provide recommendations to the appointing authority (person) of the respective agency regarding the implicated official.

The LPS stipulates that violations of COI-related provisions may result in administrative or disciplinary liability (Article 33). According to the Law on Civil Service (2018[21]), civil servants are subject to disciplinary liability for breaching rules of conduct or COI-related provisions. Minor penalties include a warning or a reprimand while severe penalties could entail a strict reprimand, salary reduction, and termination of service. However, the disciplinary liability does not extend to individuals holding political positions. Thus, in 2023, Armenia strengthened its legal framework by introducing administrative liability for state officials or officials without supervisors for a failure to submit a written statement to the CPC regarding ad hoc COI, taking actions before receiving a recommendation from the CPC or acting contrary to such recommendation (Article 169.31, Code on Administrative Violations) (1985[22]). Regarding the practical application of the COI framework described, authorities provided information about six administrative liability cases under the Code on Administrative Violations for failure to report an ad hoc COI. Each case resulted in a fine of AMD 300 000 (approximately EUR 760). The first two examples concerned community leaders fined by the CPC for awarding procurement contracts to affiliated companies without declaring COI as required by Article 33 (Part 7) of the LPS. In the third example, the head of the community was fined for approving an alienation of community land plots to an affiliated person without making a required written disclosure. In addition to the administrative penalty, law enforcement authorities initiated a criminal investigation, which remained ongoing as of April 2025. Thus, the country is compliant with element A. As noted in the Baseline Monitoring Report, the Armenian legislation does not establish sanctions for failing to resolve COI, and consequently, no sanctions for such violations were imposed during 2023-2024 (element B).

In 2023, Armenia strengthened its framework for regulating gifts through amendments to the LPS and Code on Administrative Violations. These amendments introduced procedures for registering, transferring, and evaluating gifts received by public officials as well as maintaining a gift register (Articles 29-30, LPS). Additionally, administrative liability for violations of gift acceptance rules or respective registration procedures was established under Article 166^1 of the Code on Administrative Violations. The CPC reported imposing a fine (AMD 100 000 (approx. USD 252)) on three employees of the Penitentiary Service for receiving gifts deemed unacceptable under the LPS. Authorities reported that in 2024, public officials registered around 30 gifts. However, no sanctions were imposed in 2024 for gifts or hospitality-related restrictions violations, indicating non-compliance with element C. In relation to gifts, authorities noted that although no violations were recorded in 2024, the CPC continued to provide advisory support to public

officials and integrity officers. The Commission also adopted guidelines for requesting advisory opinions and conducted training sessions/presentations on gift acceptance restrictions and relevant legal provisions. Authorities mentioned that there have been cases in which public officials, upon receiving advice, returned gifts that are not permissible under the law as a result of these efforts.

Violating incompatibility requirements by public officials results in termination of powers or removal from office (Article 31(17), LPS). As reported by the authorities, in March 2024, the CPC addressed a case involving an assistant to a Member of Parliament, prompted by a media report. The investigation revealed that while serving in the National Assembly, the official simultaneously held the position of director and owned shares in a commercial company, thereby violating incompatibility requirements. The official had failed to transfer the company shares to fiduciary management as mandated by law. Following the CPC, the official resigned as director and placed his shares under trust management. The CPC also provided information about the following cases:

- The Commission received a complaint alleging that the Head of the Agency, under the Ministry of Health, was engaged in entrepreneurial activities while holding public office. In response, the CPC addressed a letter to the Ministry of Health in 2024, requesting an investigation into a potential incompatibility violation. The Ministry informed the CPC that the individual no longer held a position as a public official
- A media publication revealed that an assistant to a community head while occupying a discretionary municipal position, also held a position as an engineer in a commercial company and engaged in other paid activities not considered permissible. The CPC recommended that the community head examine the potential incompatibility or violation. The municipality subsequently informed the CPC that the assistant had been released from the engineering position in December 2024
- Another media report indicated that an advisor to a community head while holding a discretionary municipal position, was engaged in entrepreneurial activity. In November 2024, the Commission submitted a written request to the community head, recommending an examination of the alleged incompatibility violation. The community head reported that measures had been taken to identify the violation and that the advisor had transferred his entire share in the commercial company to another person
- Based on a submitted complaint, the CPC addressed the Ministry of Education, Science, Culture and Sport in 2024, requesting an inquiry into a possible incompatibility violation by a senior specialist of the Ministry who was simultaneously engaged in entrepreneurial activity. The Ministry informed the Commission that a disciplinary inquiry had been initiated by order of the Secretary General but the process was terminated due to the employee's resignation from their position upon his own request.

The CPC investigated two additional cases in 2024. In the first case, the community head was found to be engaged in entrepreneurial activities after transferring company shares to his wife as a donation. The case, initially suspended in 2022 and referred to the Prosecutor's Office, was reopened in 2024. In the second case, a prosecutor was investigated for failing to transfer shares of a commercial organisation to fiduciary management. However, the Commission determined that shares were transferred before the individual assumed office, thus finding no violation of incompatibility requirements. The provided information, however, is not sufficient for compliance with element D.

According to the LPS (Article 32 (1)(6)), public officials are subject to disciplinary sanctions for "employment in or becoming an employer of an organisation where they exercised direct control during the last year in office". However, in the follow-up assessment period, no sanctions were applied against public officials for violations of post-employment restrictions, and thus, the country is not compliant with element E. The authorities stated that post-employment regulations are scheduled for review in 2025 as part of the Anti-Corruption Strategy (2023-2026).

In Armenia, multiple authorities and public officials oversee conflict-of-interest regulations, with the CPC playing a central role. The CPC is responsible for ensuring compliance with incompatibility requirements and COI regulations among state officials, heads and deputy heads of communities, and administrative districts in Yerevan, excluding deputies, judges, members of the Supreme Judicial Council, prosecutors, and investigators. It also ensures uniform interpretation of conduct principles for public officials and monitors adherence to model rules. The COI institutional arrangement also includes other actors such as integrity officials, ethics commissions, supervisory managers, and heads of agencies. However, a survey by the CPC revealed that out of 86 integrity officers, none reported receiving applications from public servants regarding COI cases or providing recommendations to resolve such issues in 2023. In 2024, data revealed only eight recorded violations related to conflicts of interest. These findings highlight the lack of proactive measures and effective enforcement mechanisms for addressing COI, underscoring the need for systemic improvements in Armenia's integrity framework. Authorities agree that the practices and data from individual institutions remain incomplete, and enforcement level is low. Considering a decentralised system of COI institutional arrangement, adequate support should be given to state/local agencies to align legal provisions with internal regulations and rules, and increase their capacities to apply the regulations. The CPC's role should further extend to building capacities and proactively providing training and advice to responsible officials. The latter includes training for supervising managers to ensure an understanding of potential COI situations and an ability to take appropriate remedial action. Civil society believes that even though the legally mandated tools for identifying and managing conflicts of interest are in place, they are not effectively utilised by state and local government bodies.

As described above, Armenia's legislation includes specific disciplinary measures and administrative liability; however, several critical gaps exist. While the Law on Public Service outlines a range of disciplinary sanctions, the absence of detailed guidelines and robust case law leaves ambiguity about whether deliberate non-compliance with ad hoc COI disclosure requirements or a refusal to resolve known COIs constitutes a serious breach. While traditional post-public employment rules implying disciplinary liability can target officials while still in office, it is not clear how these sanctions apply to violations after officials leave their positions; thus, the introduction of administrative sanctions should be considered. Another significant issue is a short statute of limitation period defined for disciplinary actions. Under the Law on Civil Service (Article 21), penalties for disciplinary actions must be imposed within three months of discovering the violation or within six months of its occurrence. Similarly, the CPC should examine the application regarding violations of incompatibility requirements or conflicts of interest by officials without supervisors or state officials within one year after the violation. The monitoring team believes that this narrow timeframe could weaken integrity-related enforcement efforts.

Civil society has expressed concerns about the lack of mandatory enforcement mechanisms for violations involving state officials or officials without direct supervisors. Under Article 33, while the CPC can determine violations of incompatibility requirements or COI-related regulations and recommend disciplinary liability when no administrative or criminal elements are present, its recommendations are advisory and non-binding. In cases of incompatibility violations, CPC opinions and materials are forwarded to relevant authorities to consider actions, including termination of powers but these decisions remain discretionary, limiting accountability and enforcement effectiveness. Additionally, the regulatory framework does not hold supervisors accountable for failing to prevent or address the COI, nor does it impose liability on officials within each agency responsible for making decisions in cases when ethics commissions confirm the violations. Conclusions of the ethics commission are also non-binding. Based on the information provided by non-governmental organisations, ethics commissions have been established in specific public service sectors but many of them are not operational, and some agencies (e.g. the National Assembly) have failed to establish such commissions as of June 2025.

Benchmark 2.2.2.

Sanctions are routinely imposed on high-level officials for the following violations:

Element	Compliance	
	Baseline	Follow-up
A. Violation of legislation on the prevention and resolution of ad hoc conflict of interest	X	✓
B. Violation of restrictions related to gifts or hospitality	X	X
C. Violation of incompatibilities	X	X
D. Violations related to requirements of divesting ownership rights in commercial entities or other business interests	X	X
E. Violation of post-employment restrictions	X	X

Authorities are compliant with only element A of the benchmark, which requires three cases where sanctions were imposed for violations of legislation on the prevention and resolution of ad hoc conflict of interest. The CPC provided details on the following three cases:

- On 14 March 2024, the CPC initiated administrative proceedings against a mayor for signing procurement contracts with a company involving his relative. On 26 March 2024, the CPC imposed a fine in the amount of AMD 300 000 (EUR 716)
- In 2024, the CPC initiated an administrative proceeding against another mayor for failing to disclose a conflict of interest while granting construction permits to an affiliated company. In addition to the administrative fine imposed in July 2024, the CPC submitted a report to the Prosecutor's Office
- In 2024, three other cases resulted in administrative fines imposed on community heads for failing to declare a conflict of interest (described above).

However, sanctions for other violations (elements B-E) listed in the benchmark were not imposed or applied routinely (three cases as required). For instance, only one case involving violations of incompatibility regulations resulted in sanctions against a high-level official in 2024.

Benchmark 2.2.3.

The following measures are routinely applied:

Element	Compliance	
	Baseline	Follow-up
A. Invalidated decisions or contracts as a result of a violation of conflict-of-interest regulations	X	X
B. Confiscated illegal gifts or their value	X	X
C. Revoked employment or other contracts of former public officials concluded in violation of post-employment restrictions	X	X

According to the Baseline Monitoring Report, Armenia was found non-compliant with the benchmark due to the absence of legislative measures such as revoking decisions or contracts made in violation of COI

regulations, confiscating illegal gifts and terminating employment or other contracts concluded in breach of post-employment restrictions that were not established by the legislation.

During the follow-up monitoring period, amendments to the Code on Administrative Offences introduced penalties for public officials mishandling gifts. Accepting illegal gifts related to official duties now results in fines ranging from 100 to 500 times the minimum wage and confiscation of the gift or a fine five times its value if confiscation is impossible. Failure to report gifts received by family members or affiliates incurs similar fines and confiscation. Not recording gifts as required leads to fines of 100-300 times the minimum wage or three times the gift's value if confiscation is not feasible while late or improper recording of gifts results in fines of 50-250 times the minimum wage or twice the gift's value if confiscation cannot be enforced. Despite amendments, authorities reported illegal gifts were not confiscated during 2023-2024 (element B). Furthermore, no steps were taken to introduce measures outlined by elements A and C. As a result, Armenia remains non-compliant with this benchmark.

Indicator 2.3. Asset and interest declarations apply to high-corruption-risk public officials, have a broad scope, and are transparent for the public and digitised

The LPS and related bylaws regulate Armenia's asset and interest disclosure system for public officials. The LPS defines the categories of officials required to disclose their assets and the scope of information to be reported, including by family members. Declarations must be submitted annually and upon assuming or leaving public office. Additionally, the CPC is authorised to request situational declarations from executive bodies of state-owned enterprises when necessary. The system is supported by comprehensive rules, standardised forms, and an advanced electronic platform that ensures accessibility and transparency of submitted declarations.

The Baseline Monitoring Report confirmed that Armenia has a robust declaration system underpinned by a detailed regulatory framework applicable to high-ranking elected and non-elected officials. The scope of disclosed information is extensive, covering immovable property, income, company shares, securities, bank accounts, and organisational memberships. During the follow-up assessment period, authorities enhanced accessibility by publishing declaration data in machine-readable formats. However, certain categories remain excluded from regular reporting requirements, such as members of management or supervisory bodies of state-owned organisations and non-judicial members of judicial governance bodies. To further improve the system's effectiveness in detecting and preventing corruption, automatic cross-checking with government databases should be finalised.

Benchmark 2.3.1.

The following officials are required to declare their assets and interests annually:

Element	Compliance	
	Baseline	Follow-up
A. The President, members of Parliament, members of Government and their deputies, heads of central public authorities and their deputies	✓	✓
B. Members of collegiate central public authorities, including independent market regulators and supervisory authorities	✓	✓
C. Head and members of the board of the national bank, the supreme audit institution	✓	✓
D. The staff of private offices of political officials (such as advisors and assistants)	✓	✓
E. Regional governors, mayors of cities	✓	✓
F. Judges of general courts, judges of the constitutional court, members of the judicial governance bodies	X	X
G. Prosecutors, members of the prosecutorial governance bodies	✓	✓
H. Top executives of SOEs	X	X

As confirmed by the Baseline Monitoring Report, Armenia has established a comprehensive regulatory framework for assets, interest, and expenses disclosure. This framework applies to a broad range of officials, including the President; Members of Parliament; government members and their deputies; heads, deputies, and members of autonomous bodies (e.g. Central Election Commission, Audit Chamber, and Central Bank) as well as chairperson, deputies, and board members of market regulators (e.g. Public Service Regulatory Commission, Television and Radio Commission). Additionally, it covers the personal staff of state political officials such as advisors, press secretaries, and assistants. At the local level, declaration requirements extend to community heads; mayors and their deputies; municipal personnel secretaries; community council members (in areas with a population exceeding 15 000); and heads and deputy heads of the administrative district of Yerevan. Prosecutors, including the Prosecutor General, also submit annual assets and interest declarations. Thus, during the baseline assessment period, Armenia was compliant with elements A-E and G of the benchmark.

Within Armenia's judicial branch, the obligation to submit annual declarations applies to judges and judicial members of judicial self-governance bodies. Armenian authorities informed the monitoring team that the lay members of the Supreme Judicial Council are subject to the obligation of submitting asset declarations as they are considered declarant officials under the Law on Public Service (LPS). However, neither the LPS nor the Judicial Code requires non-judicial members of other judicial governance bodies (see Indicator 6.3.3) to submit a declaration of assets and interests. Therefore, Armenia is not compliant with element F.

Since 2022, the LPS has expanded the scope of declarants to include heads and members of collegial executive bodies of state and community non-profit organisations, state foundations, and executive bodies of state-owned enterprises (SOEs) with a state or community share of 50% or more. However, these officials are subject to this requirement only upon specific request by the CPC rather than annually. The Law on Corruption Prevention Commission (Article 25.1) outlines grounds for requesting such "situational"

declarations, including credible publications about declared information, reports of significant property fluctuations, reports received from natural and legal persons or other relevant information obtained by the CPC or state agencies. Declarants must submit these declarations within one month of receiving a request. While expanding the scope of the declarants is a positive step, the lack of annual submission requirements falls short of complying with the benchmark requirement (element H).

Benchmark 2.3.2.

The legislation or official guidelines require the disclosure in the declarations of the following items:

Element	Compliance	
	Baseline	Follow-up
A. Immovable property, vehicles, and other movable assets located domestically or abroad	X	X
B. Income, including its source	✓	✓
C. Gifts, including in-kind gifts and payment for services and indicating the gift's source	X	✓
D. Shares in companies, securities	✓	✓
E. Bank accounts	✓	✓
F. Cash inside and outside of financial institutions, personal loans given	✓	✓
G. Financial liabilities, including private loans	✓	✓
H. Outside employment or activity (paid or unpaid)	X	X
I. Membership in organisations or their bodies	✓	✓

Note: The disclosure of the above items may be conditional on reaching a certain value threshold.

According to the Baseline Report, the coverage of disclosed information is also broad and includes most elements listed in the benchmark. Under Article 41 of the LPS, declarable items include the following:

- income (including the source, names of the source (natural/legal persons), nature of relations, sum, currency, and country where the income was paid)
- shares and other types of investment (including company name, type of equity or investment, date and method of acquisition, names and addresses of other parties to the transaction and their relation, total value, and currency of stock as well as a percentage of shareholding at the beginning and end of the year)
- bank deposits (including names and locations of local and foreign banks where deposits were made, currency, and the total amount of deposits at the beginning and end of the year)
- savings and all other bank accounts
- monetary funds/cash, including funds available in the bank or electronic accounts and personal loans
- existing loans and borrowings (including lenders' names and addresses, the amount, currency, interest rates, and purpose)
- membership and involvement in governing, administrative or supervisory bodies of commercial, non-commercial organisations or political parties.

Immovable property, vehicles, and any other valuables that exceed AMD 4 million are declared in the property declaration. The CPC guidelines specify that identification data concerning immovable property in foreign countries should also be provided. However, neither the Guidelines nor the declaration form nor any relevant decisions referring to this obligation provided such clarification or an explicit requirement to declare other movable assets located abroad. Thus, the Baseline Monitoring Report concluded that Armenia was non-compliant with the element. During the follow-up assessment period, authorities reported that the CPC developed a revised version of the Guideline for Completing Declarations, which now explicitly states that immovable and movable property, vehicles, gifts (including in-kind gifts and payments for services) must be declared regardless of their location, including assets located outside the Republic of Armenia. However, as these changes were adopted beyond the assessment period in May 2025, Armenia remains non-compliant with element A.

Under Armenian legislation, gifts are declared as part of income, and their source, amount, and other details are included in the declaration form. In 2023, the Baseline Monitoring Report found Armenia non-compliant with element C. In the follow-up assessment, the updated Guideline for Completing Declarations provided specific instructions on how in-kind income should be declared by persons holding public office. In particular, paragraphs 34–37 of the Guideline stipulate that (i) declarants must report the value of income received as in-kind goods; (ii) in the absence of a contractual price, the value must be assessed based on the estimated acquisition cost or market value, defined as the price typically charged for comparable goods, works or services in similar conditions. Thus, the country is compliant with element C.

Regarding outside employment and activities, all paid activities are covered under the declaration of income. However, Armenia was considered non-compliant in 2022 due to the absence of explicit provisions requiring disclosure of unpaid activities. While officials are obliged to declare membership or involvement in governing, administrative or supervisory bodies of commercial or non-commercial organisations and political parties (Article 42, LPS), voluntary activities for other organisations are not explicitly covered. No legislative changes were introduced during the follow-up assessment period to address this gap; thus, Armenia remains non-compliant with element H of the benchmark.

Benchmark 2.3.3.

The legislation or official guidelines contain a definition and require the disclosure in the declarations of the following items:

Element	Compliance	
	Baseline	Follow-up
A. Beneficial ownership (control) of companies, as understood in FATF standards, domestically and abroad (at least for all declarants mentioned in Benchmark 3.1.), including identification details of the company and the nature and extent of the beneficial interest held	✓	✓
B. Indirect control (beneficial ownership) of assets other than companies (at least for all declarants mentioned in Benchmark 3.1), including details of the nominal owner of the respective asset, description of the asset, its value	✓	✓
C. Expenditures, including date and amount of the expenditure	X	X
D. Trusts to which a declarant or a family member has any relation, including the name and country of trust, identification details of the trust's settlor, trustees, and beneficiaries	X	X
E. Virtual assets (for example, cryptocurrencies), including the type and name of the virtual asset, the amount of relevant tokens (units), and the date of acquisition	X	X

Note: The disclosure of the above items may be conditional on reaching a certain value threshold.

The Baseline Monitoring Report confirms Armenia's compliance with elements A and B of the benchmark. Specifically, Article 42 of the LPS requires declarants to disclose detailed information about their and their family members' involvement in commercial organisations. This includes the organisation's name, identification number, address, and extent of participation through shares or beneficial ownership. Declarants must also specify acquisition dates or when they gained the power to influence the organisation's governance. Additionally, the Law on Combating Money Laundering and Financing of Terrorism defines a beneficiary. The LPS further extends the declaration requirement to property nominally owned by third parties but acquired on behalf, in favour of or at the expense of the declarant or which is effectively controlled by them. The declaration form requires detailed information about such property, including the nominal owner's name and the nature of the relationship with the declarant.

Declaration requirements also encompass various expenses made in Armenian dram, foreign currency or in-kind. These include travel and accommodation expenses for leisure, charges for leasing movable or immovable property, fees for training or educational courses, costs associated with agricultural activities, loan repayments, and expenses for renovating immovable property. Any other expense, including property given as a donation, must be declared if its one-time value exceeds AMD 2 million (EUR 4 700) or its foreign currency equivalent during the reporting period. Despite this comprehensive coverage, Armenia was considered non-compliant with element C in the Baseline Monitoring Report as the declaration form does not include information on expenditure dates. During the follow-up assessment period, no legislative changes were introduced to address this issue; thus, Armenia remains non-compliant.

Similarly, non-compliance persists regarding element D. The Guide notes that a declaration form should cover trusts or similar legal arrangements to which the declarant has any relation. Such a relation may be that of a settlor, trustee, protector, beneficiary of trust or another person exercising ultimate control over the trust by means of direct or indirect ownership or by other means. In Armenian legislation, disclosure

requirements only cover trust management of shares in companies through Article 42 (Part 3) of the LPS while broader legal arrangements related to trust ownership are not addressed by legislation. The LPS does not mandate disclosing a declarant's or family member's relation to a trust either. With no changes introduced during the follow-up assessment period, Armenia remains non-compliant.

Regarding element E, while declarants are required to report virtual assets such as cryptocurrency and electronic account balances at the beginning of each year, along with their type, origin, and currency, as of the end of 2023, date of acquisition s still missing from the declaration form. Thus, non-compliance with element E remains unchanged. Authorities reiterate that virtual balances, including cryptocurrency and electronic account balances, may result from numerous transactions conducted over an extended period of time. Under the current declaration framework, they are reported only at the beginning and end of the reporting year.

Benchmark 2.3.4.

Element	Compliance	
	Baseline	Follow-up
The legislation or official guidelines require the disclosure in the declarations of information on assets, income, liabilities, and expenditures of family members, that is, at least the spouse and persons who live in the same household and have a dependency relation with the declarant.	✓	✓

The Baseline Monitoring Report confirms that the LPS mandates comprehensive financial disclosure for public officials and their family members. Under Article 34, family members – defined as the declarant's spouse, minor children (including adopted children), individuals under guardianship/curatorship, and adult cohabitants residing with the declarant for at least 183 days within the reporting period – must disclose information on their property, assets, and income upon the official's entry into office, annually during their tenure, and upon termination of their duties. Thus, compliance with the benchmark remains unchanged.

Benchmark 2.3.5.

Element	Compliance	
	Baseline	Follow-up
Declarations are filed through an online platform.	✓	✓

Armenia introduced an online platform for submitting asset and interest declarations in 2015, significantly enhancing and streamlining the submission process. In 2024, out of a total of 13 952 declarants, 6 174 officials submitted their declarations along with their 7 778 family members' declarations (see Table 2.1). Authorities confirmed that during the follow-up assessment period, the absolute majority of declarations were submitted electronically, with five hard-copy submissions in 2023 and only two in 2025. All data has been imported to the platform.

Table 2.1. Asset and interest declarations submitted by officials per reporting year

	2023	2024
The total number of declarants	14 345	13 952
The total number of submitted declarations by public officials	8 340	6 174
The total number of declarations submitted by officials' family members	8 789	7 778
The total number of situational declarations submitted by SOEs	0	0

Source: Corruption Prevention Commission.

Benchmark 2.3.6.

Information from asset and interest declarations is open to the public:

Element	Compliance	
	Baseline	Follow-up
A. Information from asset and interest declarations is open to the public by default in line with legislation, and access is restricted only to narrowly defined information to the extent necessary to protect the privacy and personal security	✓	✓
B. Information from asset and interest declarations is published online	✓	✓
C. Information from asset and interest declarations is published online in a machine-readable (open data) format	X	✓
D. Information from asset declarations in a machine-readable (open data) is regularly updated	X	✓

Note: The benchmark does not concern special legal regulations (if exists) on the declarations filed by officials whose positions are classified, or which contain other classified information.

The Baseline Monitoring Report confirms that the CPC publishes all declarations on its platform within five days of submission, ensuring timely public access (2025[23]). These declarations remain publicly accessible for one year after an official leaves office, after which they are archived. Government Decision No. 306 specifies the information excluded from public access (e.g. addresses of immovable property and detailed information about minors). Thus, in the baseline assessment period, Armenia met the requirements of elements A and B. However, as declarations were downloadable only as PDF files, the country was considered non-compliant with element C of the benchmark.

In 2023-2024, the centralised platform was enhanced to allow downloading declarations in machine-readable JSON format (element C). The CPC has implemented an Application Programming Interface (API) to facilitate automated access to the declaration system and enable developers and researchers to integrate directly declared data into their applications or analytical tools. A comprehensive API user manual is available on the CPC's website, providing detailed instructions on interacting with the API and retrieving declaration data programmatically. Regular updates of asset declarations in a machine-readable format are also ensured (element D).

Benchmark 2.3.7.

Functionalities of the electronic declaration system include automated cross-checks with government databases, including the following sources:

Element	Compliance	
	Baseline	Follow-up
A. Register of legal entities	X	✓
B. Register of civil acts	X	✓
C. Register of land titles	X	✓
D. Register of vehicles	X	✓
E. Tax database on individual and company income	X	✓

During the baseline assessment period, an automatic data transfer was ensured only with the State Revenue Service's tax database. Armenia was considered non-compliant with element E as access was limited to individual data while company-related information required manual requests or restricted access. Additionally, the platform lacked automated cross-checking capabilities with other key registers, such as those for legal entities, civil acts, land titles, and vehicles (elements A-E).

As of December 2024, authorities reported significant improvements in the functionalities of the electronic declaration system. The platform now enables automatic data exchange across several state databases, including those managed by the State Revenue Committee (tax database), the Traffic Police (information on vehicles), the Cadastre Committee, the Register of legal entities, the State Population Register and the Registry of Civil Acts, thereby facilitating submission and verification processes. Thus, Armenia is compliant with the elements.

Indicator 2.4. There is unbiased and effective verification of declarations with the enforcement of dissuasive sanctions

The Corruption Prevention Commission (CPC) continues to play a vital role in analysing and publishing asset declarations, detecting conflicts of interest, investigating integrity violations, and enforcing relevant legislation. In 2024, the CPC verified 5 330 declarations (23% of total submissions), including 4 500 mandatory integrity checks. However, only 710 annual declarations of public officials – less than 5% of all annual submissions – were verified through the regular process. Given ongoing human and financial resource constraints, it is essential for the CPC to enhance its risk-based approach further by prioritising the verification of declarations that present the highest risks and red flags to maximise the impact and effectiveness of its verification processes.

Benchmark 2.4.1.

Verification of asset and interest declarations is assigned to a dedicated agency, unit, or staff and is implemented in practice:

Element	Compliance	
	Baseline	Follow-up
A. There is a specialised staff that deals exclusively with the verification of declarations and does not perform other duties (70%) OR	100%	100%
B. Verification of declarations is assigned to a dedicated agency or a unit within an agency that has an established mandate to verify declarations and is responsible only for such verification and not for other functions (100%)		

There have been no changes in the institutional set-up for asset and interest declaration verification since 2022. Namely, the CPC continues playing a crucial role in verifying and analysing declarations made by public officials. According to Article 25 of the Law on the Corruption Prevention Commission, the agency is tasked with ensuring compliance with the requirements for completing and submitting these declarations. The Department for Analysis of Declarations, particularly its Division of Declarations, is responsible for assessing the reliability and integrity of declared data, conducting risk-based analyses, and reviewing declarations based on media reports and written applications. While the CPC has made significant strides in establishing its legal framework and operational capabilities, specific concerns have been raised regarding its staffing and resources in the Baseline Monitoring Report.

During the follow-up reporting period, the CPC increased the number of employees in the Division on Declarations from five in 2023 to seven in 2024 while vacant positions decreased from two in 2023 to none in 2024. Despite this, overall, the Commission continues to face significant financial and human resource constraints. The issues non-governmental stakeholders and some public officials raised are insufficient social guarantees for its employees, a lack of differentiated remuneration compared to other anti-corruption agencies, and the need to increase CPC's financial independence. Another significant challenge concerns expanded preventive mandate and increased responsibilities, which do not align fully with available resources, thereby limiting the capacity of the Commission to perform its functions effectively, including in the Department for Analysis of Declarations. Based on the provided information in 2023, out of 17 129 declarations submitted by public officials and their family members, only 4 400 were verified, including 4 100 declarations verified in the framework of mandatory integrity checks of judicial and prosecutorial candidates.

In 2024, the number of verified declarations increased to 5 330 (23%) out of a total of 22 839 declarations, with 4 500 mandatory integrity checks and only 710 annual declarations of public officials (less than 5% of all declarations submitted annually) verified through a regular annual verification process (e.g. external complaints, ex officio or high-level officials) (see Benchmark 2.4.2).

Authorities clarify that there is no distinction in the verification methodology used for integrity checks and asset declarations verification. To verify declarations, either a specific year's declaration is reviewed or all declarations are examined comprehensively. In contrast, integrity checks always involve thoroughly reviewing all declarations submitted by an individual and their family members. This means that, in some cases, the scope of integrity verification can be even broader than regular declaration verification as it encompasses all relevant declarations from both the official and their family members. The data indicate a significant shift in focus towards integrity verifications, with only 5% of annual declarations being subject

to regular verification – a trend driven by recent legal changes. Authorities also report significant human and resource constraints in the CPC in general and, as a result, in the Department for Analysis of Declarations, especially when compared to the Department of Integrity Checks. Given the limited number of annual declarations being verified, it is recommended that the CPC further strengthen its use of risk-based analysis. This approach would help ensure that resources are focused on reviewing declarations that present the highest risk indicators, thereby increasing the efficiency and effectiveness of the verification process.

Benchmark 2.4.2.

Verification of asset and interest declarations, according to legislation and practice, aims to detect:

Element	Compliance	
	Baseline	Follow-up
A. Conflict of interest (ad hoc conflict of interest or other related situations, for example, illegal gifts, incompatibilities)	✓	✓
B. False or incomplete information	✓	✓
C. Illicit enrichment or unjustified variations of wealth	✓	✓

As concluded by the Baseline Monitoring Report, the mandate of the CPC to verify asset and interest declarations, as well as the related legislative framework, aligns with all three elements (A-C) of the benchmark. Although the detection of conflicts of interest is not explicitly defined as a primary objective of verification, Article 27 of the LCPC specifies that one of the grounds for initiating proceedings by the CPC regarding violations of incompatibility requirements, other restrictions, rules of conduct or COI is the analysis of declarations (Article 27(1)). Enforcement data also demonstrate that violations related to conflicts of interest and incompatibility restrictions are identified through the verification process in practice (see Benchmark 2.4.5).

Furthermore, Article 25 of the LCPC stipulates that the CPC is responsible for ensuring compliance with requirements for completing and submitting declarations, as well as assessing the accuracy and integrity of the declared data. If violations of these requirements are identified, the CPC can initiate administrative proceedings (see additional details on verification outcomes under Benchmark 2.4.6).

Although detecting illicit enrichment or unjustified variations in wealth is not explicitly stated as a core objective, part 7 of Article 25 of the LCPC provides a mechanism to address such cases. In case of doubts about significant changes in a declarant's assets, such as an increase in assets or a reduction in liabilities or expenditures by the declarant or their family members that cannot be reasonably justified by lawful income, the CPC may request further information. Should the declarant fail to provide sufficient clarification or additional materials within a specified timeframe or if these materials fail to resolve existing concerns, the CPC must forward the case to the Prosecutor General's Office within three days. Unjustified variations in wealth are also incorporated into a risk-based analysis within the CPC (see Benchmark 2.4.3).

Benchmark 2.4.3.

A dedicated agency, unit, or staff dealing with the verification of declarations has the following powers clearly stipulated in the legislation and routinely used in practice:

Element	Compliance	
	Baseline	Follow-up
A. Request and obtain information, including confidential and restricted information, from private individuals and entities, and public authorities	✓	✓
B. Have access to registers and databases that are held/administered by domestic public authorities and are necessary for the verification	✓	✓
C. Access information held by the banking and other financial institutions: with prior judicial approval (50%) or without such approval (100%)	100%	100%
D. Have access to available foreign sources of information, including after paying a fee if needed	X	X
E. Commissioning or conducting an evaluation of an asset's value	✓	✓
F. Providing ad hoc or general clarifications to declarants on asset and interest declarations	✓	✓

The Baseline Monitoring Report confirmed that CPC possesses extensive powers for verifying asset and interest declarations as clearly outlined in the legislation and encompassing elements A-C, E, and F of the benchmark, except for access to foreign sources (element D).

Namely, the LCPC allows the CPC to request and receive information from various state and local self-government bodies and other entities. This includes access to sensitive data such as bank secrets, securities transactions, insurance information, and credit histories. The Commission can also engage operational-investigative bodies to verify property ownership and access numerous state registers and databases. It can also access registers and databases of state and local government bodies necessary to verify declarations (e.g. State Cadastre, Police, Tax Service, State Registry of Legal Entities, etc.).

The CPC can access banking and financial institution information without prior judicial approval although the scope of accessible data is limited to account balances, information on transactions subject to declaration, and gross input and gross output of accounts during the required period. For detailed data on all transactions, the CPC has to request the declarant provide such information, with the possibility of applying administrative sanctions for refusal to comply with the request. While the scope of information that was accessible was limited, Armenia technically complied with the benchmark's element. The monitoring team reiterates its recommendation to expand this access to include more detailed transaction information and automate the process. The Commission also has the authority to request free-of-charge studies and expert examinations from state or local self-government bodies. As noted by the authorities, the CPC regularly provides consultations and methodological assistance on integrity-related matters and declaration submissions. The statistics below demonstrate the routine application of these powers in 2023 and 2024 (see Table 2.2).

The only limitation in the CPC's powers relates to accessing foreign sources of information, which is not explicitly addressed in the LCPC beyond the possibility of utilising open sources. Thus, the country remains non-compliant with element D.

Table 2.2. Frequency of using CPC's powers in practice by the number of request types and reporting year

Type and number of requests/instances	2023	2024
Requested and obtained information, including confidential and restricted information, from private individuals and entities, and public authorities	≈ 2 400	≈ 2 680
Accessed registers and databases administered by public authorities	≈ 2 000	≈ 2 000
Accessed information held by the banking and other financial institutions	≈ 7 000	≈ 7 000
Commissioned or evaluated an asset's value	≈ 3 600	≈ 3 600
Provided ad hoc clarifications on asset and interest declarations	≈ 400	≈ 400

Source: Corruption Prevention Commission.

Benchmark 2.4.4.

The following declarations are routinely verified in practice:

Element	Compliance	
	Baseline	Follow-up
A. Declarations of persons holding high-risk positions or functions	✓	✓
B. Based on external complaints and notifications (including citizens and media reports)	X	✓
C. Ex officio, based on irregularities detected through various sources, including open sources	✓	✓
D. Based on risk analysis of declarations, including cross-checks with the previous declarations	X	X

In 2024, the CPC verified 4 400 declarations out of 8 340 declarations submitted by public officials, including 120 declarations of high-level officials as a part of its annual verification process (element A). The CPC determines a specific group of high-level officials annually through its bylaws. In 2022, 102 declarations of Members of Parliament were verified; in 2023, declarations of government members and heads of bodies subordinate to the government were verified; and in 2024, the CPC focused on the verification of declarations of representatives of territorial and local self-government bodies. However, it should be noted that only interest declarations are examined while asset, income and expenditure-related parts of declarations are not verified. Authorities explained that in addition to the above-mentioned process, the CPC also defines groups of risk-prone positions, in which case it conducts a full review/analysis of entire declarations. These risk-prone positions were not determined by decisions of the CPC in 2024. That said, as noted above, the CPC has been verifying declarations of judicial and prosecutorial candidates within the framework of their integrity check as required by the law, and thus, the country is compliant with element A.

External scrutiny continued playing an important role in the CPC's verification process in 2024, with 260 verifications initiated based on complaints and media reports, including declarations of the President, the Minister of Finance, and the Mayor of Yerevan (element B). Additionally, the CPC verified 70 declarations based on their detection sources, including open-source information, thereby demonstrating compliance with element C of the benchmark.

Concerning the risk analysis of declarations (element D), as concluded by the Baseline Monitoring Report, in 2022, the CPC manually extracted declared data from its e-system into Excel files for analysis, cross-

referencing them with public registries to identify risks such as mismatches between income and expenditures, disappearing assets or inconsistencies with government databases (e.g. vehicles or real estate). While these criteria helped detect irregularities, the Baseline Monitoring Report found it unclear how this method enabled the CPC to filter and select declarations for verification, leading to non-compliance with element D. During the follow-up assessment period, the CPC reported continuing using the same method of manual extraction of data in order to filter and extract all declarations that correspond to defined risk indicators. However, the system cannot yet identify and extract all declarations containing red flags automatically. The authorities plan to launch this system in the second half of 2026.

Table 2.3. Number of verified declarations by type of source and reporting year

Total number of declarations and grounds for verifications	2023	2024
Total number of submitted declarations*	8 340	13 952
Total number of declarations submitted by officials' family members	8 789	8 887
Total number of declarations (both officials and family members) verified, including:	4 400	5 330
- *Declarations of high-level officials***	60	120
- *External complaints received from citizens and media reports*	70	260
- *Ex officio based on irregularities detected through different sources, including open sources****	110	330
- *Verifications in the framework of integrity checks*	4 100	4 500

*Authorities note that these numbers refer to submitted declarations within the mentioned year, which may not coincide with the declaration's reporting period. For instance, declarations for the reporting periods of 2022, 2023, and 2024 were submitted in 2024.
** High-level officials included members of the Cabinet, all chairpersons of the bodies under the PM and the Government, chairpersons and members of independent and autonomous bodies, and other high-level officials in Parliament, the judiciary, and law enforcement.
*** Authorities note that the number includes the listed high-level officials whose declarations have been verified.
Source: Corruption Prevention Commission.

Benchmark 2.4.5.

The following measures are routinely applied:

Element	Compliance	
	Baseline	Follow-up
A. Cases of possible conflict of interest violations (such as violations of rules on ad hoc conflict of interest, incompatibilities, gifts, divestment of corporate ownership rights, post-employment restrictions) detected based on the verification of declarations and referred for follow-up to the respective authority or unit	✓	✓
B. Cases of possible illicit enrichment or unjustified assets detected based on the verification of declarations and referred for follow-up to the respective authority or unit	✓	✓
C. Cases of violations detected following verification of declarations based on media or citizen reports and referred for follow-up to the respective authority or unit	✓	✓

In 2024, following the analysis of interest declarations of regional governors, their deputies, and community heads (105 individuals), the CPC revealed around 20 violations, and in three cases, community heads violated conflict-of-interest regulations: an administrative fine of AMD 300 000 was imposed. Additionally,

the CPC identified four instances of possible illicit enrichment or unjustified assets, which were referred to the Prosecution Office. Out of the 260 declarations verified based on media and citizen reports, violations were detected in 52 declarations.

Table 2.4. Number of declarations/cases by type of violation and reporting year

Type of cases	2023 year	2024 year
Total number of declarations in which the violation was detected	22	22
Total number of declarations with false or incomplete information	22	20
Total number of violations of conflict of interest (ad hoc conflict of interest, illegal gifts, incompatibilities, etc.)	0	2
Total number of cases of illicit enrichment or unjustified variations of wealth	0	4 (All four cases were sent to the Prosecutor General's Office)
Cases of violations were detected following verification of declarations based on media or citizen reports.	27	52

Note: Based on the verification of declarations within the framework of integrity checks, the CPC detected violations in 112 declarations submitted during 2024. However, administrative proceedings were ongoing at the time of monitoring, and thus, this number is not included in the list above.
Source: Corruption Prevention Commission.

Benchmark 2.4.6.

The following sanctions are routinely imposed for false or incomplete information in declarations:

Element	Compliance	
	Baseline	Follow-up
A. Administrative sanctions for false or incomplete information in declarations	✓	✓
B. Criminal sanctions for intentionally false or incomplete information in declarations in cases of a significant amount, as defined in the national legislation	X	X
C. Administrative or criminal sanctions on high-level officials for false or incomplete information in declarations	✓	✓

The Code on Administrative Offences (Article 169.28) establishes sanctions for violations related to the completion and submission of declarations, including negligence in providing incomplete data. Submission of false information or concealment of information triggers criminal liability under Article 444 of the Criminal Code. In 2024, administrative penalties were imposed in 12 cases for false or incomplete information in declarations, including on 11 high-level officials (elements A and C). The following three cases of routine application of administrative sanctions against high-level officials were provided:

- A head of the community failed to declare an affiliated person's participation in a commercial organisation in his submitted declaration on property, income, and interest. On 7 May 2024, the CPC imposed an administrative fine of AMD 200 000 (EUR 470)
- Neglecting to declare information about an affiliated person's involvement in commercial organisations resulted in a fine imposed on a first-instance judge of AMD 200 000 (EUR 470) on 29 May 2024

- In April 2024, the CPC imposed an administrative sanction in the amount of AMD 200 000 (EUR 470) on the head of the community following the submission of false or incomplete information.

Additionally, authorities provided information about one case in which criminal sanctions were imposed for submitting intentionally false or incomplete information in an asset declaration although this is not sufficient to demonstrate routine application (element B).

Table 2.5. Sanctions imposed for false or incomplete information in declarations by type and reporting year

	2023	2024
Administrative sanctions are imposed for false or incomplete information in declarations	2	12
Criminal sanctions are imposed for intentionally false or incomplete information in declarations in cases of a significant amount as defined in the national legislation	1	1
Administrative sanctions imposed on high-level officials for false or incomplete information in declarations	2	11

Note: The CPC notes that for illicit enrichment/unjustified wealth, several cases have been initiated and are ongoing.
Source: Corruption Prevention Commission.

Box 2.1. Asset declaration e-system

The new Asset Declarations electronic platform was launched in January 2023, marking significant improvements to declaration submission, publication, and reporting processes. In particular, the new system has functionalities that were not available in the former system, such as:

- automated creation of respective declarations for all declarant types
- automated field validations requiring accurate data in all fields of declarations
- interoperability with state databases, allowing automatic filling of declarations with data available in a real-time regime, which eliminates mistakes and discrepancies in declarations
- two-factor user identification and verification functionality
- public portal enhanced with data protection and cybersecurity features.

The electronic declaration system was further improved in 2024. In addition to registries of civil acts and tax database, integration was ensured between the e-system and the data repositories of the State Register Agency of legal entities under the Ministry of Justice of Armenia, the Traffic Police under the Ministry of Internal Affairs (vehicles), and Registry of Cadastre Committee (land and other immovable property). This enables automatic data import functionality. Necessary data from these authorities are automatically generated and reflected in the declarations. The process for submitting applications related to changes in declaration data was also automated. This means such applications are submitted through the e-system, and the entire workflow is managed within the e-system via corresponding actions and automated notifications. The reporting module was enhanced, enabling the generation of various reports, for example, lists of declarations submitted after the deadline, missing or overdue declarations, and lists of declarants who received donations. As a result of technical upgrades to the e-system, full export of publicly available data is now possible (OpenAPI). At the same time, additional efforts were made to minimise the submission of incorrect or incomplete data due to unintentional errors during the declaration process. The number of overdue declarations has drastically decreased. For comparison, by 31 May 2023, 693 public officials and 2 415 family members had overdue declarations whereas by 31 May 2024, only 201 public officials and 1 578 family members had not submitted their declarations. In 2025 this number has decreased to 60 public officials and 704 family members.

Source: Corruption Prevention Commission (2025[23]), Register of Asset and Interest Declarations of Armenia, https://cpcarmenia.am/en/declaration-register/.

Assessment of non-governmental stakeholders

The non-governmental sector has identified critical gaps in Armenia's conflict-of-interest regulations and enforcement mechanisms. The private sector and government-affiliated foundations are largely excluded from COI oversight, leaving risks in areas such as public procurement unaddressed. Ineffective enforcement by responsible agencies and insufficient support provided to integrity officers further exacerbate these issues. NGOs have proposed expanding the mandate of the CPC to enforce codes of conduct, manage COI, and uniformly apply restrictions across public institutions while also improving co-ordination with ethics commissions and integrity officers. They advocate clear procedures and timelines for oral and written COI declarations, along with mechanisms to register and publish this information to enhance transparency. Additionally, actionable processes are needed to address ad hoc COI in key areas like recruitment, procurement, licensing, and inspections. NGOs also suggested that an electronic system for COI statement registration should be designed and interconnected with the CPC's electronic declaration system and the Civil Service Office's personal case management system for public officials and servants. Despite minor legal advancements, enforcement remains weak, with limited sanctions imposed in 2023-2024. Civil society also points out that current sanctions are not sufficiently dissuasive; in several instances, even after administrative fines were imposed, violations persisted and their consequences continued.

Overall, the asset declaration system and related legal framework have been positively assessed although some NGOs believe that commercial organisations with participating heads of state; civil and municipal servants who act as inspectors, perform supervisory roles or are involved in granting state and community procurements, licenses, and permits; and assistants and advisors to community heads holding discretionary positions should be covered by the LPS. The scope of asset declarations is considered sufficiently comprehensive and effectively aligning with the objectives of the declaration system. According to NGOs, Armenia's asset declaration system, while advanced and transparent, faces some shortcomings in ensuring comprehensive transparency. NGOs note that while declarations are publicly accessible, certain limitations such as shielding specific data impede thorough analysis by civil society and media. NGOs have expressed concerns about complications in accessing the declarations of family members of public officials. They pointed out that the system does not allow viewing all declarations submitted by an official and their family members across different years, making it more challenging to comprehensively analyse connections and potential conflicts of interest. While acknowledging the lack of financial and human resources; stakeholders criticised the CPC's declining capacity to verify the broader number of asset declarations, which, in their view, has hindered the detection of violations related to illegal enrichment, incompatibility requirements, and COI breaches.

3 Protection of whistleblowers

The 2023 amendments mark a positive step toward strengthening the legal framework for whistleblower protection in Armenia. However, several critical legislative gaps remain unaddressed. These include the requirement for additional verification before reporting, disqualification of whistleblowing based on motive, limited reporting channels for private sector employees, and the absence of several crucial protection mechanisms. Since adopting the Law on Whistleblower Protection in 2018, there have been no reported cases where whistleblower protection measures were requested or provided in practice. This lack of enforcement highlights the urgent need for a comprehensive reassessment of the current model, including a review of its alignment with international standards. While the Human Rights Defender's Office has been granted additional powers to protect whistleblowers, it still lacks dedicated personnel responsible for ensuring effective enforcement of the respective legal provisions.

Figure 3.1. Performance level for the protection of whistleblowers is average

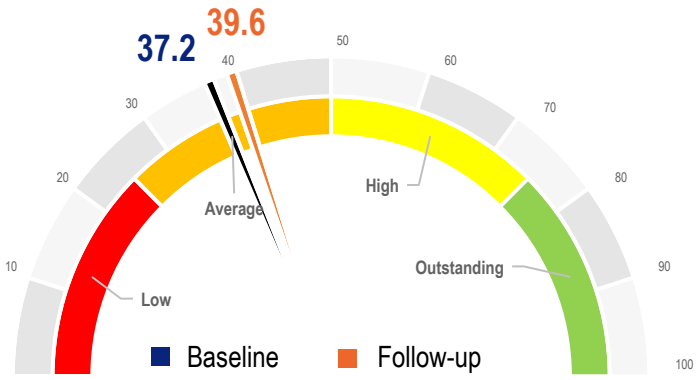
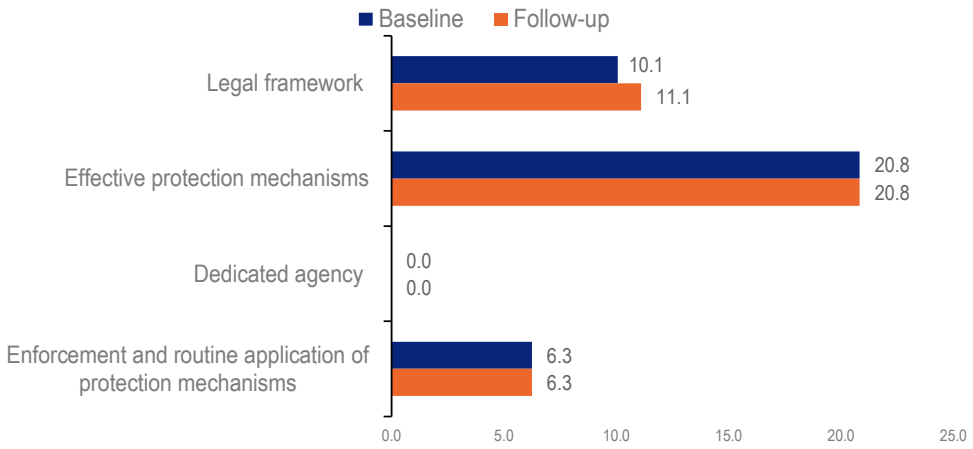


Figure 3.2. Performance level for protection of whistleblowers by indicators



Indicator 3.1. The whistleblower's protection is guaranteed in law

Since 2018, Armenia has had a stand-alone Law on the System of Whistleblowing (2018[24]). Subsequent amendments that improved the legal framework were adopted in 2022 but entered into force in the follow-up reporting period in 2023. These changes included introducing public disclosure as a reporting channel, expanding the employer definition, and shifting the burden of proof in whistleblower protection cases to the defendant (employer). The Human Rights Defender has also been assigned additional powers to protect whistleblowers through confidential consultation and legal assistance.

Amendments introduced in 2023 represent progress in further improving the existing legal framework. However, several legislative gaps remain unaddressed. These include an additional verification duty before reporting, disqualification of whistleblowing based on motive, limited channels to the private sector, and the absence of several essential protection mechanisms. Additionally, despite the law being in force for the last six years, Armenia has yet to report any practical case of whistleblower protection. This lack of enforcement highlights limited public awareness but, more importantly, it underscores the need for a comprehensive reassessment of the current model established by the Law on the System of

Whistleblowing. Such analysis should identify gaps in compliance with international standards and bring greater clarity to reporting processes and responsibilities, particularly regarding external reporting channels. These additional measures, coupled with extensive awareness-raising work conducted by the authorities in the follow-up assessment period, would facilitate more effective implementation of the legal framework in practice.

Benchmark 3.1.1.

The law guarantees the protection of whistleblowers:

Element	Compliance	
	Baseline	Follow-up
A. Individuals who report corruption-related wrongdoing at their workplace that they believed true at the time of reporting	X	X
B. Motive of a whistleblower or that they make a report in good faith are not a precondition to receiving protection	X	X
C. If a public interest test is required to qualify for protection, corruption-related wrongdoing is considered to be in the public interest, and their reporting qualifies for protection by default	✓	✓

Note: Corruption related wrongdoing means that the material scope of the law should extend to: 1) corruption offences (see definition in the introductory part of this guide); and 2) violation of the rules on conflict of interest, asset and interest declarations, incompatibility, gifts, other anti-corruption restrictions. At their workplace means that a report is made based on information acquired through a person's current or past work activities in the public or private sector. As such, citizen appeals are not covered.

Under Armenia's Law on the System of Whistleblowing (hereinafter "LWP"), whistleblower protection applies to individuals reporting corruption; breaches related to conflict of interest, codes of conduct, incompatibility, and declaration requirements; and other anti-corruption restrictions or acts "aimed to harm public interests or pose a threat thereto" (2018[24]). This aligns with the definition of "corruption-related wrongdoing" and corresponds to the criteria of reporting wrongdoing "at their workplace" as set by the Assessment Framework. The LWP stipulates that the report should be made in good faith, which is established if three conditions are met: (i) a reporting person has reasonable grounds for suspecting a violation; (ii) he/she genuinely believes the information to be true; and (iii) before reporting steps to verify the accuracy and completeness of the information were taken (Article 13, LWP). However, as noted in the Baseline Monitoring Report, the third condition imposes an additional verification burden on the whistleblower that exceeds the established requirement of "believing the information to be true at the time of reporting". As of April 2025, this requirement remains unchanged, leaving Armenia non-compliant with element A of the benchmark.

The LWP (Article 13) also defines bad faith whistleblowing under three conditions: (i) using information obtained unlawfully, such as criminal activity or violations of constitutional rights; (ii) seeking or receiving personal or third-party benefits; or (iii) intentionally providing false information to harm another. According to the Assessment Guide, compliance could be maintained if the whistleblower's motives are deemed immaterial when determining eligibility for protection. However, the LWP disqualifies whistleblowers whose motive is to seek or gain an advantage. As the Baseline Monitoring Report concluded, this provision, which has not been changed in the follow-up assessment period, does not comply with element B of the benchmark. Public interest is not a prerequisite for whistleblower protection under the LWP, ensuring Armenia's compliance with element C.

Despite recent amendments to the LWP, these legislative gaps persist. Furthermore, practical cases of whistleblower protection have not been reported in practice (see Indicator 3.3.4), limiting opportunities to test these legal provisions in practice in the follow-up assessment period.

Benchmark 3.1.2.

Whistleblower legislation extends to the following persons who report corruption-related wrongdoing at their workplace:

Element	Compliance	
	Baseline	Follow-up
A. Public sector employees	✓	✓
B. Private sector employees	X	X
C. Board members and employees of state-owned enterprises	X	✓

Note: Whistleblower legislation means all legal provisions defining whistleblowing, reporting procedures and protections provided to whistleblowers.

According to the Baseline Monitoring Report, the LWP extends to reporting in state bodies, local self-government bodies, and public organisations, thereby complying with element A. However, the baseline assessment revealed that, in 2022, the LWP did not extend to private sector employees, board members, and employees of state-owned enterprises as required by elements B and C.

The amendments introduced in 2023 broadened the definitions of “whistleblower” and “whistleblowing” under the LWP to all organisations, including those in the private sector (Article 2, Part 1(2), LWP). However, the LWP restricts internal whistleblowing mechanisms exclusively to public sector employees, excluding private sector employees from internal reporting channels. As a result, the whistleblowing protection framework may not adequately safeguard private sector employees, leaving only the external reporting channel available to them. The assessment framework requires that all legal provisions defining whistleblowing, reporting procedures, and protections for whistleblowers should fully extend to private sector employees. While Armenia’s system adopts a broad definition of “whistleblower”, it does not provide private sector employees with the same reporting procedures and protections available to their public sector counterparts. In practice, private sector whistleblowers are limited to using only the external reporting channel, which inherently offers a narrower range of protection measures. This limitation leaves private sector whistleblowers more vulnerable and less likely to come forward. Additionally, the Law employs a broad definition of “competent authority”, potentially encompassing any state agency (see Benchmark 3.2.1). However, most state agencies are not equipped to implement most of the protection measures listed in the legislation. Thus, Armenia is not compliant with element B.

The latest amendments to the LWP have expanded the definition of whistleblowing to include state-owned enterprises (SOEs), clarifying that the term “state body” also covers organisations where the state holds more than 50% of shares. While this change ensures that the LWP complies with element C by extending protections to a broader range of public sector entities, authorities are encouraged to increase awareness among SOEs and ensure that official guidelines on whistleblower protection clearly outline related obligations for all such organisations.

Benchmark 3.1.3.

Element	Compliance	
	Baseline	Follow-up
Persons employed in the defence and security sectors who report corruption-related wrongdoing benefit from equivalent protections as other whistleblowers	✓	✓

The Baseline Monitoring Report confirmed that the LWP does not distinguish between different categories of public sector employees and applies uniformly across all state institutions, including those in the defence and security sectors. With no changes in the follow-up assessment period, Armenia remains compliant with the benchmark.

Benchmark 3.1.4.

Element	Compliance	
	Baseline	Follow-up
In administrative or judicial proceedings involving the protection of the rights of whistleblowers, the law regulating respective procedures places on the employer the burden of proof that any measures taken against a whistleblower were not connected to the report.	X	X

During the baseline assessment, the LWP did not include provisions to shift the burden of proof to employers, resulting in non-compliance with the benchmark. In 2023, Article 12 of the LWP was amended to explicitly require employers to demonstrate the legality of their actions or inactions against whistleblowers during judicial proceedings. However, the monitoring team believes that Article 12(4) of the law is narrow in scope as it only requires demonstrating the "legality of actions or inactions taken against the whistleblower" but not proving that the measures taken were not connected to the whistleblower's report. Thus, the current legal provision may fall short in explicitly showing the absence of a causal link between the report and any negative measures taken as such actions may appear lawful on the surface (de jure) but are applied selectively to reporting persons. Thus, the monitoring team considers Armenia non-compliant.

In administrative proceedings, the legislative framework generally places the burden of proof on administrative bodies as stipulated by Article 29 of the Administrative Procedure Law. The principle is further clarified by the Law on the Basics of Administration and Administrative Proceedings (Article 43), specifying that the burden of proof rests with (i) an individual when favourable factual circumstances exist or (ii) an administrative body when unfavourable factual circumstances prevail. Additionally, the Armenian legislation establishes a presumption of reliability in administrative proceedings, whereby information provided by an individual regarding factual circumstances is deemed reliable unless the administrative body proves otherwise (Article 10, Law on the Basics of Administration and Administrative Proceedings). While these provisions and principles comply with the benchmark, their practical implementation remains to be tested. The administrative proceedings also apply exclusively to whistleblowers within the public

sector; therefore, the principles described above do not address every possible scenario and whistleblowers in the private sector would instead pursue their cases through civil legal proceedings.

Benchmark 3.1.5.

The law provides for the following key whistleblower protection measures:

Element	Compliance	
	Baseline	Follow-up
A. Protection of the whistleblower's identity	✓	✓
B. Protection of personal safety	X	X
C. Release from liability linked with the report	X	X
D. Protection from all forms of retaliation at the workplace (direct or indirect, through action or omission)	✓	✓

The Baseline Monitoring Report confirmed that the LWP protects whistleblowers' identities by prohibiting disclosure or sharing personal data without their consent (element A). This protection is further reinforced by administrative and criminal sanctions for unauthorised publication or disclosure of whistleblower information as stipulated by Article 41.5 of the Code of Administrative Offences and Article 502 of the Criminal Code. Additionally, the LWP protects whistleblowers from all forms of workplace retaliation (element D), encompassing a broad range of acts or omissions that could disadvantage them in the workplace due to their reporting activities. However, in 2022, the Armenian legislation did not provide mechanisms to protect whistleblowers' safety or measures to exempt them from liability linked to their reports (elements B-C), as highlighted in the Baseline Monitoring Report.

During the follow-up assessment period, legislative amendments introduced new procedures for obtaining special protection (Article 10, Part 3, LWP). To qualify, a whistleblower must apply to a *"competent authority",* which, upon approval, forwards the application to the police to implement protection measures as prescribed under the Criminal Procedure Code (2021[25]) and Government Decree 560 (2022[26]). The government decree refers to the Law on Police, which mandates the police to safeguard the life, health, and property of individuals not involved in criminal proceedings in collaboration with other "*competent authorities*" (Article 10.1). However, the monitoring team noticed that the Criminal Procedure Code (Article 73) empowers the Human Rights Defender to request special protection measures from the "*body implementing the proceedings*". Despite the Law on Police having a broader scope, Article 73 of the Criminal Procedure Code, which refers to the Human Rights Defender's request for protection, specifically applies to persons involved in criminal proceedings. This provision potentially restricts protection to cases involving whistleblower reports pertaining to a crime and related to ongoing criminal proceedings. Thus, the monitoring team believes that the existing provision is narrow in scope and not compliant with element B. Furthermore, the definition of "competent authority" set by the LWP is overly broad and ambiguous, encompassing state bodies, local self-government bodies, and public organisations receiving internal as well as external reports and authorities responsible for the actual execution of personal protection measures (see Benchmark 3.2.1).

Under Article 10 (Part 3.3) of the LWP, whistleblowers are exempt from liability for whistleblowing unless their actions involve elements of a crime. However, this exemption applies only if whistleblowing itself does not constitute a criminal offence. Thus, it could exclude protection in cases where information was lawfully obtained but the reporting is deemed unlawful (e.g. unauthorised use of classified information). Thus, in line with the Assessment Framework and its Guide, Armenia remains non-compliant with element C.

Benchmark 3.1.6.

The law provides for the following additional whistleblower protection measures:

Element	Compliance	
	Baseline	Follow-up
A. Consultation on protection	X	✓
B. State legal aid	✓	✓
C. Compensation	X	X
D. Reinstatement	X	X

During the baseline assessment in 2022, only state legal aid (element B) was explicitly available to whistleblowers. In 2023, legislative amendments to the LWP (Article 10, Part 2(1)) established the right of whistleblowers to receive a confidential advisory consultation from the Human Rights Defender. The Law on Human Rights Defender also specifies that the Human Rights Defender is empowered to provide confidential advice and outline the options for protecting their rights and freedoms upon request from whistleblowers or their affiliated person (Article 30, Part 2(3)). As a result, Armenia is compliant with element A.

The compensation required under element C refers to legislative provisions providing a whistleblower the right and access to financial compensation for damages suffered due to workplace retaliation. The amended LWP specifies that whistleblowers can use the means of protection provided by the Civil Code and other laws to protect their rights (Article 10, Part 3(1)). Authorities note that Article 234 of the Labour Code outlines conditions when an employer incurs material liability, is loss, destruction or unusability of an employee's property or if there are other violations of the employee's or other person's property rights. The employer must compensate for the damage according to the procedures established by the Civil Code (Article 1058, also Articles 1058-1091, Civil Code). However, as the primary law fails to explicitly state that whistleblowers *have the right to compensation* for damages (not limited to material damages) suffered and thus eliminate any doubts about the applicability of other aforementioned legal provisions concerning whistleblowers, Armenia remains non-compliant with element C.

To comply with element D, the primary law should also provide reinstatement that implies a legal remedy in a court of law in case a whistleblower faces dismissal, transfer, demotion or the restoration of a cancelled permit, license or contract due to having made a report on corruption-related wrongdoing. The authorities cite Article 10 (Part 3(1)) of the LWP and the Labour Code as the basis for this protection. However, the Labour Code does not explicitly provide for the reinstatement of whistleblowers dismissed due to reporting an offence. Notably, Article 265 of the Labour Code allows for the restoration of an employee's rights if their employment is terminated without legal grounds or in violation of procedure. This provision may be inadequate as the employment could formally be terminated on legal grounds but motivated by retaliation. As a result, Armenia remains non-compliant with element D.

Indicator 3.2. Effective mechanisms are in place to ensure that whistleblower protection is applied in practice

In 2024, most potential whistleblower reports were received through an online platform operated by the Prosecutor General's Office. Out of 380 reports, 301 were anonymous and received through the online platform, operated by the Prosecutor General's Office. The ambiguity regarding the nature of the reports

submitted, together with the extremely low number of internal reports, underscores the urgent need for greater transparency on the platform's role and strengthening the effective implementation of internal reporting channels to foster a culture of accountability within organisations. No cases of whistleblower protection measures were requested or provided in practice in 2023 and 2024.

Benchmark 3.2.1.

The following reporting channels are provided in law and available in practice:

Element	Compliance	
	Baseline	Follow-up
A. Internal at the workplace in the public sector and state-owned enterprises	X	X
B. External (to a specialised, regulatory, law enforcement or other relevant state body)	✓	✓
C. Possibility of public disclosure (to media or self-disclosure, e.g., on social media)	X	X
D. The law provides that whistleblowers can choose whether to report internally or through external channels	✓	✓

As confirmed by the Baseline Monitoring Report, the LWP designates at least one state agency responsible for receiving external whistleblowers' reports of corruption-related wrongdoing (element B). Additionally, the law also acknowledges the availability of both internal and external channels and does not impose any explicit restrictions on using either or both options (element D). There have been no changes in compliance with these two elements.

Regarding internal channels (element A), the benchmark requires establishing procedures that allow employees to report corruption-related wrongdoing to an impartial person or unit responsible for receiving and processing such reports within the public sector or state-owned enterprises (see the Assessment Guide). The current version of the law defines internal whistleblowing as submitting a report to immediate supervisors, their superiors or a person authorised by the head of the competent authority without explicitly mandating the creation of formal internal reporting channels. The legal framework obliges authorities to "establish the procedure for record-keeping and formulation of reports, as well as for implementation of the means of protection provided to a whistleblower" (Article 5, Part 3). On the other hand, the standard form for the record-keeping and formulation of reports as well as the procedure for implementing the means of protection provided to a whistleblower are established by Government Decision 272. Neither the law nor the government decision explicitly requires establishing reporting channels or adopting internal procedures, and Government Decision 272 only requires each agency to publish information about the designated person on its website. During the follow-up reporting period, most ministries and many state institutions published contact information of their designated responsible persons (for example, the Ministry of Environment, the Ministry of High-Technological Industry, the Ministry of Justice, the Ministry of Labour and Social Affairs), with some also providing additional information about the reporting procedures under the LWP. However, several agencies have published only general information without clearly referencing the designated persons' whistleblowing protection functions (for example, the Ministry of Economy or the Food Safety Agency). The majority of these websites do not ensure that this information is easily accessible. The LWP stipulates that failure to fulfil established obligations entails liability provided for by law although a liability mechanism for such failure (e.g. obligations in relation to setting up reporting channels and ensuring their accessibility) is not established. Furthermore, the term "competent authority"

is overly broadly defined and does not distinguish between the whistleblower's employer or external organisations such as the Prosecutor General's Office or the Human Rights Defender's Office. Government Decision 272 also requires that "confidentiality of the whistleblower's personal data, as well as the confidentiality of the information submitted within the framework of the whistleblower's report, shall be ensured by the head of the competent authority, the responsible person, *and other bodies and persons involved in the whistleblowing process by law"*. This provision suggests that agencies should clearly define internal procedures to restrict access to reported information. Examples of orders appointing designated responsible persons in certain state agencies were provided although procedural aspects and liabilities (beyond general requirements set by the LWP) were not explicitly referenced in provided bylaws. Thus, Armenia is considered non-compliant.

As noted by the Baseline Monitoring Report, the designated external channel under the LWP is an online platform operated by the Prosecutor General's Office; thus, Armenia was considered compliant with element B. The platform primarily facilitates anonymous reporting but can also be used as an external reporting channel. According to the authorities, in 2024, the platform received 380 external reports of which 301 were anonymous reports and 79 with submission of data. The authorities noted that criminal proceedings were initiated for 21 reports of which 10 were on corruption crimes; 39 reporting proceedings were terminated; initiation of whistleblowing proceedings was rejected for 106; and 237 were sent to the investigating body to verify the report. However, the monitoring team was not provided with more detailed information regarding the types of reports (e.g. number of reports related to corruption-related violations).

Regarding the possibility of public disclosure (element C), this provision was introduced through amendments effective January 2023. According to Article 9 (Part 2) of the LWP, if a report submitted through other channels is not processed in accordance with legal requirements and timeframes, a whistleblower may disclose the report to the public via mass media. However, contrary to the requirement of the Assessment Framework and its Guide, public disclosure is not permitted before exhausting internal or external channels, even in cases where corruption-related wrongdoing poses an imminent or manifest danger to the public or when there is risk of retaliation, or a low likelihood of the breach being addressed through external reporting channels. Thus, Armenia remains non-compliant with element C.

Benchmark 3.2.2.

Element	Compliance	
	Baseline	Follow-up
A central electronic platform for filing whistleblower reports is used in practice.	✓	✓

The LWP allows anonymous reporting through a unified electronic whistleblowing platform launched in 2019 (https://www.azdararir.am/hy/). Considering the platform's functionalities, such as possibilities to collect, store, protect, and exchange data and feedback, the Baseline Monitoring Report confirmed its compliance with the benchmark's requirements for a central electronic whistleblowing system. In total, 99 and 301 anonymous reports were received in 2023 and 2024, respectively (see Table 3.1). Due to limited information on the nature of the reports received, the monitoring team was unable to determine to what extent the platform functions as a dedicated external or anonymous whistleblower channel for disclosures made in a professional context rather than serving primarily as a general crime reporting tool. This lack of clarity, coupled with the very limited number of internal reports received (see Benchmark 3.2.1), highlights the need for greater transparency and more detailed reporting to ensure the platform effectively fulfils its intended role in supporting whistleblowers.

Table 3.1. Types of reports received and addressed through the electronic whistleblower platform by reporting year

Total number of reports received	2023	2024
Anonymous reports	99	301
Other (external) reports received	17	79
Criminal case initiated (out of the total number)	1	21
Number of protection measures provided	0	0

Source: Information provided by the Armenian authorities.

Benchmark 3.2.3.

Anonymous whistleblower reports:

Element	Compliance	
	Baseline	Follow-up
A. Can be examined	✓	✓
B. Whistleblowers who report anonymously may be granted protection when they are identified	✓	✓

Armenia was compliant with both elements in the baseline assessment period. Namely, Article 9 of the LWP requires that anonymous reports be submitted exclusively through a unified electronic platform. This means anonymous reports could only be filed online and not through internal channels. By operating as a central mechanism for receiving external reports, Armenia complies with element A, as also confirmed by the Baseline Monitoring Report. The LWP extends the established protection for external reports to anonymous reporting, aligning with element B.

Indicator 3.3. The dedicated agency for whistleblower protection has clear powers defined in law and is operational in practice

In 2022, the Baseline Monitoring Report concluded that Armenia lacked a dedicated agency, unit or staff specifically responsible for the whistleblower protection framework as defined by the Assessment Framework and Guide. This requires the existence of an agency, unit within an agency or specialised staff that exclusively handles specific functions without performing additional duties.

In the follow-up assessment period, new functions in whistleblower protection were assigned to the Human Rights Defender by LWP amendments that came into force on 1 January 2023. In the follow-up reporting period, an Assistant to the Human Rights Defender has been assigned to ensure the registration and processing of reports in internal and external whistleblowing cases. However, the monitoring team reiterates that the Human Rights Defender, cited as a dedicated agency by the Armenian authorities, cannot be considered as such as there is no clear evidence demonstrating that the responsible person (Assistant to the Human Rights Defender) performs functions exclusively related to whistleblower protection. Therefore, Armenia remains non-compliant with all benchmarks under Indicator 3.3. below.

Benchmark 3.3.1.

Element	Compliance	
	Baseline	Follow-up
There is a dedicated agency, unit or staff responsible for the whistleblower protection framework.	X	X

There was no dedicated agency, unit or staff, so Benchmarks 3.3.2. - 3.3.4. are considered non-compliant as well.

Benchmark 3.3.2.

A dedicated agency, unit or staff has the following key powers clearly stipulated in the legislation:

Element	Compliance	
	Baseline	Follow-up
A. Receive and investigate complaints about retaliation against whistleblowers	X	X
B. Receive and act on complaints about inadequate follow-up to reports received through internal or external channels or violations of other requirements of whistleblower protection legislation	X	X
C. Monitor and evaluate the effectiveness of national whistleblower protection mechanisms through the collection of statistics on the use of reporting channels and the form of protection provided	X	X

There was no dedicated agency, unit or staff, so Benchmarks 3.3.2. - 3.3.4. are considered non-compliant as well.

Benchmark 3.3.3.

The dedicated agency, unit or staff has the following powers clearly stipulated in the legislation:

Element	Compliance	
	Baseline	Follow-up
A. Order or initiate protective or remedial measures	X	X
B. Impose or initiate imposition of sanctions or application of other legal remedies against retaliation	X	X

There was no dedicated agency, unit or staff, so Benchmarks 3.3.2. - 3.3.4. are considered non-compliant as well.

Benchmark 3.3.4.

Element	Compliance	
	Baseline	Follow-up
The dedicated agency, unit or staff responsible for the whistleblower protection framework functions in practice	X	X

There was no dedicated agency, unit or staff, so Benchmarks 3.3.2. - 3.3.4. are considered non-compliant.

Indicator 3.4. The whistleblower protection system is operational, and protection is routinely provided

Despite being in force since 2018, as of December 2024, there have been no practical cases of whistleblower protection requested or provided to evaluate the effectiveness of Armenia's whistleblower protection framework. In the Baseline Monitoring Report, non-governmental stakeholders attributed the lack of enforcement to a lack of awareness and trust among public officials regarding internal and external reporting channels. This scepticism was reiterated during the follow-up assessment period, with additional remarks about the need to clarify some of the provisions and streamline the mechanisms involved in disclosing wrongdoing. Thus, due to the absence of practical applications, Armenia does not meet the benchmarks for Indicator 3.4 below, excepting Benchmark 3.4.4.

Benchmark 3.4.1.

Element	Compliance	
	Baseline	Follow-up
Complaints of retaliation against whistleblowers are routinely investigated.	X	X

There is no information that any of the mentioned protections were applied in 2023-2024.

Benchmark 3.4.2.

Element	Compliance	
	Baseline	Follow-up
Administrative or judicial complaints are routinely filed on behalf of whistleblowers.	X	X

There is no information that any of the mentioned protections were applied in 2023-2024.

Benchmark 3.4.3.

The following protections are routinely provided to whistleblowers:

Element	Compliance	
	Baseline	Follow-up
A. State legal aid	X	X
B. Protection of personal safety	X	X
C. Consultations	X	X
D. Reinstatement	X	X
E. Compensation	X	X

There is no information that any of the mentioned protections were applied in 2023-2024.

Benchmark 3.4.4.

Element	Compliance	
	Baseline	Follow-up
There are no cases where breaches of confidentiality of a whistleblower's identity were not investigated and sanctioned.	✓	✓

The monitoring team is not aware of any cases in which breaches of confidentiality regarding a whistleblower's identity were not investigated and sanctioned.

Assessment of non-governmental stakeholders

Non-governmental stakeholders welcomed the 2023 amendments to the LWP that remove previous limitations based on organisational size or public importance. The stakeholders also confirm that the legal framework now allows whistleblowers to disclose information publicly, and whistleblowers are exempt from liability in case of reporting. Additionally, interlocutors were positive regarding additional protection measures introduced, such as confidential advice and legal assistance from the Human Rights Defender. On the other hand, civil society noted that neither the law nor Government Decision No. 560 clearly outlines conditions or procedures for applying special protective measures in non-criminal whistleblowing cases, leaving significant ambiguity in their implementation. Non-governmental organisations confirmed that the law does not allow for comprehensive protection of private sector employees. A restriction to exhaust internal and external whistleblowing channels before public disclosure was also considered highly problematic. Another issue that most stakeholders shared was the vague definition of "competent authorities". Interlocutors noted a lack of clarity regarding which specific authorities could qualify as "competent". They believe there is an overlap of functions between several authorities, confusing potential whistleblowers. Concerns were also raised about the lack of information, noting that the existing electronic platform includes only limited qualitative data on anonymous reports received, with no details about the types of reports, agencies, follow-up measures, etc. Civil society recommends expanding the list of data to be collected by competent authorities, clarifying procedures for collecting and publishing these data, and ensuring their accessibility on the websites of all competent authorities and the Human Rights

Defender (HRD). They recommend establishing a more comprehensive and clear definition of harmful actions, including harmful actions of a non-labour nature in Article 2 of the law and specifying the threat of retaliation, in which case the person is also subject to protection.

The interlocutors were not aware of any comprehensive training programmes provided to responsible public officials to familiarise them with the procedures of whistleblowing processes. Civil society also believes that the Human Rights Defender's Office lacks sufficient human and financial resources to handle expanded responsibilities, such as providing advice, monitoring activities and publishing statistics on whistleblower protection.

4 Business integrity

Adopted in 2024, a new Corporate Governance Code (CGC) establishes the responsibility of boards of companies listed in stock exchanges to oversee risk management, including corruption risk management. For most listed companies, the authority to monitor their compliance with the CGC is unclear. There is no evidence of monitoring being conducted in practice. Since 2023, all legal entities have been required to submit information on their beneficial owners to the authorised agency although authorities do not routinely verify beneficial ownership information. The responsible agency routinely applies sanctions for failing to submit information but not for false information. Armenia does not have a dedicated institution, such as a business ombudsman. A dedicated division within the Human Rights Defender's Office only partially meets assessment requirements. The five selected SOEs do not have anti-corruption compliance programmes and did not conduct corruption risk assessments.

Figure 4.1. Performance level for business integrity is average

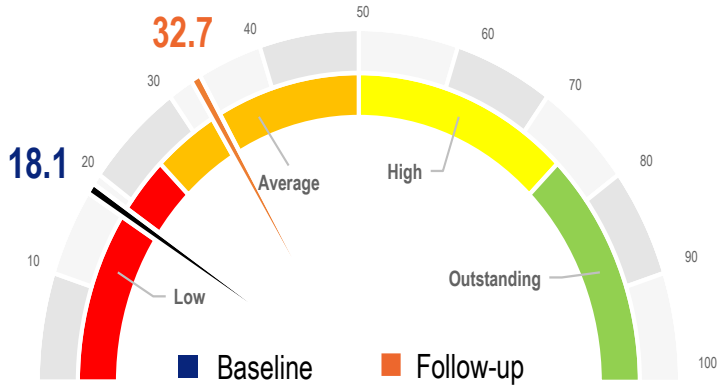
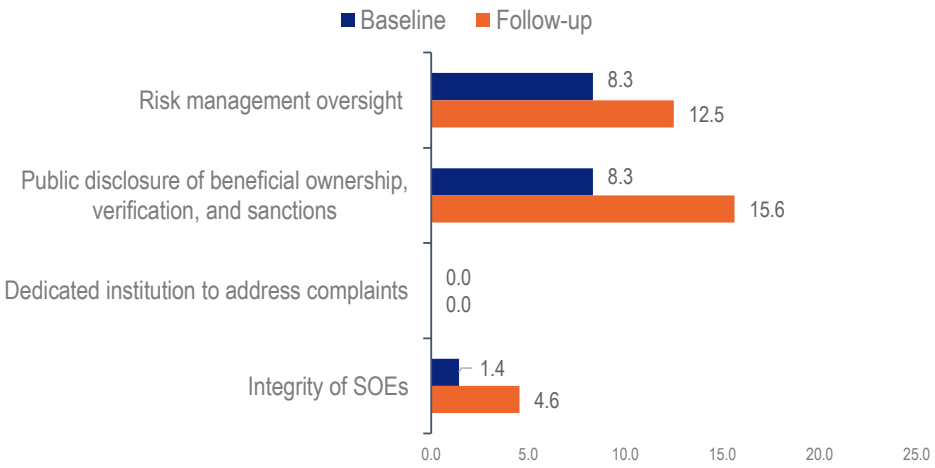


Figure 4.2. Performance level for business integrity by indicators



Indicator 4.1. Boards of listed/publicly traded companies are responsible for oversight of risk management, including corruption risks

In the follow-up assessment period, Armenia adopted a new Corporate Governance Code (CGC), which entered into force on 30 August 2024 (Ministry of Economy of Armenia, 2024[27]).[3] The new CGC replaced the CGC adopted in 2010 and previously assessed by the Baseline Monitoring Report. As in the past, accession to the new CGC is voluntary unless otherwise specified by law.

The new CGC establishes the responsibility of the boards of companies listed in stock exchanges to oversee risk management, including corruption risk management. This is a substantial improvement compared to the baseline period since the board's oversight responsibility was unclear under the previous CGC. Companies listed on the stock exchange are required to have a CGC and publish annual corporate governance reports on their websites. However, for the majority of listed companies, the country's legislation does not clearly define an authority responsible for monitoring the compliance of listed companies with the CGC, and there is no evidence of monitoring of compliance being conducted in practice.

Benchmark 4.1.1.

The Corporate Governance Code (CGC) establishes the responsibility of the boards of companies listed in stock exchanges to oversee risk management:

Element	Compliance	
	Baseline	Follow-up
A. CGC or other related documents establish the responsibility of boards to oversee risk management	✓	✓
B. CGC or other related documents establish the responsibility of boards to oversee corruption risk management	X	✓
C. CGC or other related documents which establish responsibility to oversee risk management are mandatory for listed companies	✓	✓

The new CGC adopted in 2024 ensures "the integrity of the accounting, financial and non-financial reporting, including the independence of internal and external audits, and compliance with relevant control systems, in particular, risk management, financial and operational control". The Board may form a risk management committee if that is warranted by the size, structure, field of activity, and level of development of the organisation or the needs of the Board and the profile of its members. In the absence of a risk management committee, the Board may also form an audit committee, which would carry out, among other things, the analysis of the internal controls and risk management of the organisation. Considering this, the country is compliant with element A.

In the follow-up assessment period, the country is also compliant with element B since the new CGC prescribes that the Board should ensure anti-corruption compliance through the introduction of the Ethics and Compliance Program and ensuring control over its implementation. Though the corruption risks are not explicitly mentioned in the functions of the Board presented for element A above, the responsibility of the Board for overall risk management, coupled with the responsibility to oversee the implementation of an Ethics and Compliance Program, which in turn can be effective only upon conducting an anti-corruption risk assessment, makes the country compliant with this element.

The CGC approved by the authorised government agency is not mandatory for companies. However, companies listed or applying to be listed, in the stock exchange – Armenia Securities Exchange OJSC (AMX) are required to accept and apply at least the principles outlined in the CGC of the Republic of Armenia unless they have already applied equivalent or stricter principles of corporate governance.[4] AMX listing rules also require equity issuers listed on the AMX main (A) and secondary (B) lists to publish an annual report on corporate governance principles and the level of the issuer's compliance with the latter, at least on their website.[5] In turn, the Order of the Minister of Economy approving the CGC, and the CGC itself also obligate organisations acceding to the CGC to prepare for each reporting year and publish on their webpage the annual report, which includes the corporate governance report with the annual corporate governance statement. The monitoring team considers Armenia compliant with element C.

Benchmark 4.1.2.

Securities regulators or other relevant authorities monitor how listed companies comply with the CGC:

Element	Compliance	
	Baseline	Follow-up
A. The legislation identifies an authority responsible for monitoring the compliance of listed companies with the CGC	X	X
B. The monitoring is conducted in practice	X	X

In the Baseline Monitoring Report, the country did not comply with element A since the authorities had provided ambiguous information and stated that the legislation did not provide for an authority responsible for overseeing the compliance of listed companies with CGC. During the follow-up assessment, the authorities referred to the AMX's Rules on Surveillance, which specify that AMX controls the timely and complete disclosure by listed issuers of the information required by AMX rules, without obvious shortcomings (para. 6, point 3 of the Rules on Surveillance of the Armenia Securities Exchange OJSC). The monitoring team understands that this provision grants AMX the authority to monitor the CGC compliance of only those issuers whose equity is listed on the AMX main (A) and secondary (B) lists as the AMX listing rules require publication of an annual report on corporate governance only from those issuers. According to the information provided by authorities, only 6 out of 29 issuers have their equities listed on the main (A) and secondary (B) lists.

The authorities also referred to another provision of the Armenia Securities Exchange's (ASE's) Rules on Surveillance, which specifies that AMX controls compliance with other requirements defined by the AMX for the normal functioning of the market (para. 6, point 4 of the Rules on Surveillance of the Armenia Securities Exchange OJSC). However, the application of this provision to ASE's monitoring over compliance of listed companies with the CGC is unclear.

The authorities further stated that all listed financial institutions are supervised by the Central Bank of the Republic of Armenia (CBA), and that the supervision framework includes supervision over compliance of the financial institutions with their adopted corporate governance principles (Part 1 of Article 57, points (b) and (e) of Article 60, and part 6 of Article 43 of the Law on Banks and Banking Activities; Articles 39.1 and 39.7 of the Law on the Central Bank). However, based on the legislation, there is no co-ordination between the CBA and AMX regarding the monitoring of the compliance of listed financial institutions with CGC. The authorities stated that the results of the CBA's monitoring of compliance with the CGC by listed financial institutions are published on the CBA's website. However, the CBA does not directly provide the results to the ASE. The country remains non-compliant with element A.

The country also did not comply with element B during the baseline and follow-up assessment periods. During the follow-up assessment, the government stated that the Operational Supervisory Service of the AMX regularly monitors listed organisations' compliance with the CGC, based on the Rules of Supervision. However, as during the baseline, the government did not provide evidence of AMX conducting the monitoring in practice. The government informed that the country is taking steps to develop capacities and implement enhancements to the oversight system within the stock exchange or another state body. The authorities plan to monitor the compliance of listed companies with CGC after 30 June 2025, the deadline for the companies to publish their corporate governance reports and statements under the new CGC for the first time.

Indicator 4.2. Disclosure and publication of beneficial ownership information of all companies registered in the country, as well as verification of this information and sanctioning of violations of the relevant rules, are ensured

The Law on State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions, and Individual Entrepreneurs requires all companies to submit information on their beneficial owners to the State Register Agency of Legal Entities under the Ministry of Justice of Armenia (State Register Agency).

The rollout of the requirement to submit information on beneficial owners started in September 2021 and, since 1 January 2023, has been applied to all legal entities registered in Armenia. The information on beneficial owners is available online in a machine-readable format and free of charge. However, public authorities verify beneficial ownership information only on an ad hoc basis. Also, while the State Register Agency applied sanctions for failing to submit information on beneficial owners, it did not routinely apply sanctions for submitting false information.

Benchmark 4.2.1.

There is a mandatory disclosure of information about the beneficial owners of registered companies:

Element	Compliance	
	Baseline	Follow-up
A. The country's legislation must include the definition of beneficial owner (ownership) of a legal entity, which complies with the relevant international standard	✓	✓
B. The law requires companies to provide a state authority with up-to-date information about their beneficial owners, including at least the name of the beneficial owner, the month and year of birth of the beneficial owner, the country of residence and the nationality of the beneficial owner, the nature and extent of the beneficial interest held	X	✓
C. Beneficial ownership information is collected in practice	✓	✓

Both in the baseline and follow-up assessment periods, Armenia complied with element A. The Law on Combatting Money Laundering and Terrorism Financing defines the beneficial owner of a legal entity as a natural person who (i) directly or indirectly holds 20% and more of the voting stocks (issued stocks, shares) of the legal person or has 20% and more direct or indirect participation in the authorised capital of the legal person; (ii) ultimately (de facto) exercises control over the given legal person through other means; and (iii) is an official carrying out the overall or routine management of the given legal person (in case no natural person complying with the requirements of subpoints "i" and "ii" of above is identified) (Point 14 of Part 1 of Article 3). The definition is, in general, compliant with the Financial Action Task Force (FATF) definition of beneficial owner. With no changes in the respective legislation, Armenia remains compliant with element A.

In the baseline assessment period, the country was found non-compliant with element B since the requirement to submit information about beneficial owners did not apply to limited liability companies and non-commercial organisations having only natural persons as participants. Starting 1 January 2023, the requirement applies to all legal entities registered in Armenia. According to the Law on the State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions and Individual Entrepreneurs and other related regulations, companies are required to submit the following information

about their beneficial owners, among others: the name, citizenship, date of birth, residential (registration) address, date of becoming a beneficial owner, as well as the grounds for being considered a beneficial owner, including the nature and size of the beneficial interest held. Legal entities are required to submit information on beneficial owners within 40 days of state registration and within 40 days after any changes in the information on the beneficial owner. In addition, legal entities should confirm annually that beneficial owner information is accurate and has not changed or otherwise submit the updated information. Based on the above, in the follow-up period, the country is compliant with element B.

The country remains compliant with element C as the beneficial ownership information continues to be collected through the dedicated website. (State Register Agency of Legal Entities of Armenia, 2025[28]). The authorised representative of the legal entity enters the system and fills in the data about the beneficial owners, which, upon verification, becomes publicly available on the website. The government reports that 51 185 legal entities submitted 53 996 beneficial ownership declarations in 2023, and 51 210 legal entities submitted 55 918 declarations in 2024.[6] The number of legal entities required to submit beneficial ownership declarations amounted to 116 893 in 2023 and 125 820 in 2024. The monitoring team urges the government to implement measures aimed at increasing the rate of legal entities submitting beneficial ownership declarations.

Benchmark 4.2.2.

Public disclosure of beneficial ownership information is ensured in machine-readable (open data), searchable format and free of charge:

Element	Compliance	
	Baseline	Follow-up
A. Beneficial ownership information is made available to the general public through a centralised online register	✓	✓
B. Beneficial ownership information is published in a machine-readable (open data) and searchable format	✓	✓
C. Beneficial ownership information is available to the general public free of charge	X	✓

Armenia was compliant with elements A and B of the benchmark in the baseline assessment periods. The information on beneficial owners is available on the dedicated website in a machine-readable format (JSON) and is searchable (Ministry of Justice of Armenia, 2025[29]). The published information includes the name of the legal entity's beneficial owner, the beneficial owner's citizenship, the date of becoming a beneficial owner, the grounds for being the beneficial owner of a legal entity, and the size of the beneficial interest held. Though the information is accessible to the public free of charge, as noted by the Baseline Monitoring Report, in 2022, the database seemed to contain information only for companies in the mining sector (element C). Since the follow-up assessment period, the information on beneficial ownership of all companies that submitted such information has been available to the public and thus, Armenia is compliant with element C.

Benchmark 4.2.3.

Element	Compliance	
	Baseline	Follow-up
Beneficial ownership information is verified routinely by public authorities	X	X

In 2023-2024, the State Register Agency did not routinely verify beneficial ownership information. For 2023-2024, the government provided information regarding three cases where the State Register Agency initiated administrative proceedings to assess the correctness of beneficial ownership information submitted by legal entities. In one of the cases, due to doubts regarding the credibility of the beneficial ownership information, the Agency submitted materials of the administrative proceeding to the Prosecutor General's Office. In the second case, the Agency identified indications of a potential offence under Article 294, Part 1 of the Criminal Code of Armenia and also submitted the case to the Prosecutor General's Office.[7] In the third case, the proceedings were terminated as the Agency concluded that there was no administrative violation. In all three cases initiated in 2023-2024, the matter of inaccuracy was raised not by the Agency as a result of routine verification procedures but by third parties (an NGO or other state authorities, i.e. the Ministry of Finance and the State Commission for the Protection of Economic Competition). The Assessment Framework requires the public authorities (the Agency) to conduct verification of the beneficial ownership information recorded in the central register by applying a random or risk-based approach. The monitoring team concludes that Armenia does not comply with the benchmark requiring routine verification.

Benchmark 4.2.4.

Sanctions are applied routinely, at least for the following violations of regulations on registration and disclosure of beneficial ownership:

Element	Compliance	
	Baseline	Follow-up
A. Failure to submit for registration or update information on beneficial owners	X	✓
B. Submission of false information about beneficial owners	X	X

Based on information provided by the government, in 2024, the State Register Agency initiated 197 administrative proceedings related to the failure of individuals obligated to submit declarations on beneficial owners to provide the required information within the legally prescribed deadlines (Article 169.29, Code of Administrative Violations). The outcomes of the proceedings were as follows:

- The Agency terminated 91 cases as the legal entities submitted the beneficial ownership declarations after the initiation of proceedings
- The Agency issued warnings as a measure of administrative liability to 103 individuals obligated to submit declarations for legal entities
- The Agency terminated three cases due to the expiration of the statute of limitations for imposing administrative penalties.

The authorities provided information on three specific cases of sanction application for the failure to submit declarations regarding beneficial owners as required by the Assessment Framework. Hence, in the follow-up assessment period, Armenia is compliant with element A. However, the State Register Agency did not routinely apply sanctions for submitting false information about beneficial owners in 2023-2024; thus, Armenia remains non-compliant with element B.

Indicator 4.3. There is a mechanism to address concerns of companies related to the violation of their rights

In the baseline and follow-up assessment periods, Armenia did not have a dedicated institution, such as a business ombudsman, to fully meet the definition established by the Assessment Framework for this indicator. The government referred to the Human Rights Defender, the Competition Protection Commission, the Small and Medium-sized Enterprise (SME) Development Council and sub-council, and the Interdepartmental Commission for Supporting Investment Programs as entities that can review and address business complaints; however, these institutions cannot not be considered for this indicator as they have a different mandate and scope of authority. As a result, Armenia is not compliant with both benchmarks of this indicator.

Benchmark 4.3.1.

There is a dedicated institution – an out-of-court mechanism to address complaints of companies related to the violation of their rights by public authorities, which:

Element	Compliance	
	Baseline	Follow-up
A. Has the legal mandate to receive complaints from companies about violation of their rights by public authorities and to provide protection or help businesses resolve their legitimate concerns	X	X
B. Has sufficient resources and powers to comply with this mandate in practice	X	X
C. Analyses systemic problems and prepares policy recommendations to the government on improving the business climate and preventing corruption	X	X

The Human Rights Defender (HRD): The activities of the HRD are regulated by the Constitutional Law on the Human Rights Defender, whereby the HRD is an ombudsman function that has the authority to consider violations of human rights and freedoms enshrined in the Constitution of Armenia. From the Constitution, it seems that fundamental rights that would potentially apply to business entities would be the “freedom of economic activity and guaranteeing economic competition” and the “right to property”. In the baseline assessment period, the HRD’s Department of Civil, Socio-Economic, and Cultural Rights Protection dealt with business rights protection, which the monitoring team considered not compliant. In the follow-up assessment period, the authorities reported that within the HRD’s Office the Division for the Protection of Rights in the Field of Business was established, which implements the protection of business entities from state bodies, including from inefficient tax and customs administration and the protection of human rights and freedoms from public service organisations.

The HRD's mandate only partially meets the benchmark requirement. According to the Assessment Framework and its Guide, "the benchmark requires the government to appoint or establish in practice an entity that has a special mandate for receiving and following up on alleged violations of company rights by actions or omissions on the part of the state or municipal authorities…" and "…legislation should provide this institution with powers to conduct administrative investigations and to provide protection or other legal help, such as requiring a state body cancelling decisions that infringed on company's interests, other actions restoring company's legitimate interests".

The monitoring team acknowledges the establishment of the Division for the Protection of Rights in the Field of Business within the HRD's office, which seems to meet the requirement of a dedicated unit within an agency as defined by the Assessment Guide. However, the mandate of the HRD in the area of business rights protection extends to considering violations of constitutional human rights and freedoms, and addressing applications to the Constitutional Court, submitting opinions on the applications heard by the Constitutional Court related to businessmen, drafting legislative acts, etc. The HRD has no legal power to conduct administrative investigations and provide protection to businesses. The Division for the Protection of Rights in the Field of Business had only three staff positions of which two were occupied as of 31 December 2024. According to the authorities, the HRD has insufficient resource allocation both from the perspective of the number of staff positions and their remuneration (element B).

Notwithstanding the matter of mandate (element A), the HRD publishes annual reports on the Activities of the Human Rights Defender and the State of Protection of Human Rights and Freedoms, which contain a section on Protection of Rights in the Area of Business. However, authorities did not provide evidence of submitting the HRD's policy recommendations to the relevant government authorities through official channels. Thus, the country is not compliant with element C.

Other institutions: the authorities also indicated the Competition Protection Commission (during the baseline assessment), the SME Development Council and sub-council, and the Interdepartmental Commission for Supporting Investment Programs (during the follow-up assessment) as institutions that, in their opinion, could be regarded as business ombudsman-type. However, based on the review of these institutions' mandates and scope, none of them could be classified as a "dedicated institution – an out-of-court mechanism to address complaints of companies related to violation of their rights by public authorities". Thus, Armenia is not compliant with elements A-C.

Benchmark 4.3.2.

The institution mentioned in Benchmark 4.3.1 publishes online at least annually reports on its activities, which include the following information:

Element		Compliance	
		Baseline	Follow-up
A.	Number of complaints received and the number of cases resolved in favour of the complainant	X	X
B.	Number of policy recommendations issued and the results of their consideration by the relevant authorities	X	X

The HRD publishes online annual reports on the Activities of the Human Rights Defender and the State of Protection of Human Rights and Freedoms. The monitoring team did not observe in the HRD's annual reports for 2023 and 2024 statistics about: a) number of complaints received with respect to violation of business rights and the number of cases resolved in favour of the complainant, and b) number of policy

recommendations issued in the area of business rights protection and the results of their consideration by the relevant authorities. Armenia remains non-compliant with both elements A and B of this benchmark.

Indicator 4.4. State ensures the integrity of the governance structure and operations of state-owned enterprises (SOEs)

As of December 2023, there were 147 joint-stock companies with more than 50% state participation in Armenia. Their management powers were assigned to 25 authorised bodies, including ministries, regional authorities, and agencies reporting to the Government of Armenia or ministries. The activities of these SOEs, including the formation of the board and executive management, are governed by the Law on Joint-Stock Companies and other related legislation.

The follow-up assessment assessed the same five SOEs as the Baseline Monitoring Report, which are as follows:

- "Armenian Nuclear Power Plant" (ANPP) Close Joint Stock Company (CJSC)
- "High Voltage Electric Networks" CJSC (HVEN)
- "Yerevan Thermal Power Plant" CJSC (Yerevan TPP)
- "Jrar" CJSC (Jrar)
- "Surb Grigor Lusavorich Medical Centre" CJSC (SGLMC).

In the follow-up assessment period, compliance with the SOE governance structure and operations remained low. Compliance of the selected SOEs with most of the benchmark elements remained unchanged, with only a few SOEs complying with some elements. In three out of five selected SOEs, one-third of the board members are independent members while the other two SOEs do not have a board. In one SOE, the appointment of a new CEO followed an online advertisement to fill the vacancy. In another SOE, following the departure of the CEO, the Acting CEO was appointed without a competitive selection. Similar to the baseline assessment period, the five selected SOEs do not demonstrate the existence of established anti-corruption compliance programmes and corruption risk assessments. The level of information disclosure by the SOEs is also very low, with only a few SOEs publishing their financial and operating results on their company websites. The monitoring team reiterates the importance of prioritising the implementation of anti-corruption compliance programmes in the SOEs and welcomes initiatives to implement corruption risk assessment and management systems that the Corruption Prevention Commission plans to undertake.

Benchmark 4.4.1.

Supervisory boards in the five largest SOEs:

Element	Compliance									
	Baseline					Follow-up				
	ANPP	HVEN	TPP	Jrar	SGLMC	ANPP	HVEN	TPP	Jrar	SGLMC
A. Are established through a transparent procedure based on merit, which involves online publication of vacancies and is open to all eligible candidates	X	N/A	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B. Include a minimum of one-third of independent members	X	X	✓	N/A	N/A	✓	✓	✓	N/A	N/A

In the Baseline Monitoring Report, ANPP and Yerevan TPP were not compliant with element A as sufficient information to assess appointments was not provided. The element was not applicable for the three other SOEs since there were no board appointments in 2022 (HVEN) or the SOEs did not have supervisory boards (Jrar and SGLMC). In the follow-up assessment period, element A was not applicable for all SOEs. In particular, at ANPP, there was no change in the board composition. At HVEN and Yerevan TPP, changes in the board membership were due to change of the General Director, who became a board member ex officio (no online publication and solicitation of applications for board membership is expected).[8] Jrar and SGLMC did not have supervisory boards.

Concerning element B, according to the Baseline Monitoring Report, ANPP and HVEN were not compliant since the information provided was insufficient to determine who among the board members was independent. Yerevan TPP was compliant, as two of six board members were independent. For Jrar and SGLMC, the element was not applicable as they did not have a board. In the follow-up assessment period, the compliance status for element B remained unchanged for three SOEs (Yerevan TPP, Jrar and SGLMC) and changed from non-compliant to compliant for two SOEs (ANPP and HVEN). In particular, based on the information received, two of the six board members of ANPP and two of the six board members of HVEN were independent.

Benchmark 4.4.2.

CEOs in the five largest SOEs:

Element	Compliance									
	Baseline					Follow-up				
	ANPP	HVEN	TPP	Jrar	SGLMC	ANPP	HVEN	TPP	Jrar	SGLMC
A. Are appointed through a transparent procedure which involves online publication of vacancies and is open to all eligible candidates	N/A	X	N/A	N/A	N/A	N/A	✓	X	N/A	N/A
B. Are selected based on the assessment of their merits (experience, skills, integrity)	N/A	X	N/A	N/A	N/A	N/A	X	X	N/A	N/A

In the Baseline Monitoring Report, for both elements A and B, one SOE (HVEN) was not compliant due to the lack of information to demonstrate that the appointment of the CEO in 2022 followed a transparent merit-based procedure. The benchmark was not applicable for the other four SOEs as no CEO appointments occurred in 2022.

In the follow-up monitoring period, the assessment remained the same for all the SOEs except HVEN and Yerevan TPP as there were either no new CEO appointments in 2023-2024 (ANPP and Jrar) or the government did not provide additional information to the monitoring team (SGLMC). For HVEN, the authorities provided evidence that the appointment of the new CEO in 2024 followed an online publication of the vacancy and was open to all eligible candidates. Thus, the monitoring team considers HVEN compliant with element A. However, the authorities did not provide evidence to confirm that the candidates' evaluation was based on their merits and followed the prescribed selection procedure, resulting in non-compliance with element B.[9] For Yerevan TPP, the government reported that there have been three changes in the position of General Director since 2022. However, there were no online announcements of the competition to fill the vacant position of General Director in 2023-2024; during the specified period, the company had a temporary Acting General Director or a person performing the duties of the General Director. Yerevan TPP is not compliant with elements A and B.

Benchmark 4.4.3.

The five largest SOEs have established the following anti-corruption mechanisms:

Element	Compliance									
	Baseline					Follow-up				
	ANPP	HVEN	TPP	Jrar	SGLMC	ANPP	HVEN	TPP	Jrar	SGLMC
A. Compliance programme that addresses SOE integrity and prevention of corruption	X	X	X	X	X	X	X	X	X	X
B. Risk assessment covering corruption	X	X	X	X	X	X	X	X	X	X

During the follow-up assessment period, all five SOEs remained non-compliant with elements A and B. Armenian authorities reported that the CPC is considering phasing in the introduction of corruption risk assessment and management systems in SOEs, prioritising the five SOEs included in this monitoring report.[10] When introducing corruption risk assessment and management systems, the CPC plans to utilise the pilot corruption risk assessment results in SOEs and state (community) non-commercial organisations, completed in 2024.[11] A draft law on Amendments to the Law on the Corruption Prevention Commission had been developed to empower the CPC with respective authorities and was under consideration at the time of the follow-up monitoring.

Also, starting in 2024, ANPP, HVEN, and Yerevan TPP are implementing the ISO 37001: 2016 Anti-Bribery Management Systems and ISO 31000: 2018 Risk Management standards, which are planned to be completed in 2025.[12] The monitoring team finds that implementing the mentioned initiatives will help the SOEs comply with the benchmark in future assessments.

Benchmark 4.4.4.

In the five largest SOEs, the anti-corruption compliance programme includes the following:

Element	Compliance									
	Baseline					Follow-up				
	ANPP	HVEN	TPP	Jrar	SGLMC	ANPP	HVEN	TPP	Jrar	SGLMC
A. Rules on gifts and hospitality	X	X	X	X	X	X	X	X	X	X
B. Rules on prevention and management of conflict of interest	X	X	X	X	X	X	X	X	X	X
C. Charity donations, sponsorship, and political contributions	X	X	X	X	X	X	X	X	X	X
D. Due diligence of business partners	X	X	X	X	X	X	X	X	X	X
E. Responsibilities within the company for oversight and implementation of the anti-corruption compliance programme	X	X	X	X	X	X	X	X	X	X

According to the Baseline Monitoring Report, none of the five selected SOEs met the benchmark. All five SOEs remain non-compliant with elements A-E in the follow-up assessment period, as well.

ANPP: During the baseline monitoring, the authorities referred to a procedure approved by the CEO (element A) or to laws and government decrees (elements B and D). However, insufficient information was provided for the monitoring team to verify compliance with the cited legal acts. The authorities confirmed that ANPP did not have rules implemented for charity donations, sponsorship, and political contributions (element C) and did not provide information about responsibilities for oversight and implementation of the anti-corruption compliance programme (element E). During the follow-up assessment, the authorities provided a copy of the Code of Conduct developed as part of the implementation of ISO 37001: 2016 Anti-Bribery Management Systems, and put into application in June 2025. Since the follow-up assessment covers 2023-2024, implementing the Code of Conduct does not impact the compliance status of ANPP but will be considered in future assessments.

HVEN and Yerevan TPP: During the baseline assessment period, the monitoring team did not receive information to assess compliance with the benchmark elements for HVEN and Yerevan TPP. During the follow-up assessment, the authorities informed the team that the companies are implementing the ISO 37001: 2016 Anti-Bribery Management Systems, which will be completed in 2025.

JRAR: During the baseline assessment period, the monitoring team could not assess compliance because the authorities had provided insufficient information. According to the government, Jrar was at the final stage of developing a compliance programme; however, no further information on the programme was

made available. During the follow-up assessment monitoring, the authorities only noted that the company follows domestic legislation for the areas covering elements A-E, with no additional information provided.

SGLMC: In relation to SGLMC, the government did not provide information on elements A-E for the baseline or follow-up assessment periods.

Benchmark 4.4.5.

The five largest SOEs disclose via their websites:

Element	Compliance									
	Baseline					Follow-up				
	ANPP	HVEN	TPP	Jrar	SGLMC	ANPP	HVEN	TPP	Jrar	SGLMC
A. Financial and operating results	✓	✓	✓	X	X	✓	✓	✓	✓	X
B. Material transactions with other entities	X	X	X	X	X	X	X	X	X	X
C. Amount of paid remuneration of individual board members and key executives	N/A	N/A	X	N/A	X	N/A	N/A	N/A	N/A	N/A
D. Information on the implementation of the anti-corruption compliance programme	X	X	X	N/A	X	X	X	X	X	X
E. Channels for whistleblowing and reporting anti-corruption violations	X	X	X	X	X	X	X	X	X	X

During the baseline assessment period, three (ANPP, HVEN, and Yerevan TPP) out of five SOEs were compliant with element A concerning the disclosure of financial and operating results on their respective websites. The other two SOEs were not compliant as Jrar did not have a website. As for SGLMC, the authorities did not provide information to confirm compliance.

In the follow-up assessment period, four SOEs – ANPP, HVEN, Yerevan TPP, and Jrar – were found to comply with element A. Jrar's status was changed to compliant as it now had a website where it publishes its financial and operating results.[13]

Regarding the publication of information about material transactions with other entities, the amount of paid remuneration of individual board members, implementation of the anti-corruption compliance programme, and channels for whistleblowing (elements B-E), all five SOEs were either not compliant or the elements not applicable in the baseline and follow-up assessment periods.

Concerning element B, four out of five SOEs provided links to either centralised procurement websites (ANPP, HVEN) or the procurement pages on their company websites (Yerevan TPP, Jrar) in the follow-up assessment period. This does not satisfy the monitoring methodology requirement for information on material transactions. The monitoring team also noted that Yerevan TPP's website contained information about projects financed by international development banks, including the names of third-party entities with whom Yerevan TPP concluded contracts. However, the monitoring team found that the information on Yerevan TPP's website was not organised to highlight material transactions to potential users of information; hence, Yerevan TPP was considered non-compliant.[14]

Regarding publication of the amount of remuneration of individual board members and key executives (element C), the element was not applicable for all five SOEs in the follow-up period, as the board members of ANPP, HVEN, and Yerevan TPP did not receive remuneration, and Jrar and SGLMC did not have a board.

In the follow-up monitoring period, the authorities did not provide information about publication of information on the implementation of anti-corruption compliance programmes (element D) or channels for whistleblowing and reporting anti-corruption violations (element E) for most of the five SOEs. The authorities provided links to the websites of other state agencies regarding ANPP's whistleblowing channels. For Jrar, the authorities informed that no cases were reported but did not clarify channels. Upon checking, Jrar's website did not contain information about channels for whistleblowing or reporting anti-corruption violations.

Assessment of non-governmental stakeholders

Non-governmental stakeholders generally welcomed the adoption of the new Corporate Governance Code. However, there is a lack of oversight mechanisms for implementing CGC principles, especially in non-financial sector companies. Among initiatives to promote the adoption of the CGC, non-governmental stakeholders mentioned awareness-raising activities CSOs conduct among businesses. The Business Integrity Club was also initiated several years ago by a CSO. Non-governmental stakeholders and business representatives believe that one of the factors for promoting the CGC is the incentives government could offer, such as advantages in state procurement or the granting of privileges. Interlocutors also suggested developing guidelines and templates for implementing the CGC, especially for SMEs who usually lack resources. They also noted that collaboration mechanisms could be created and promoted between companies willing to implement anti-corruption compliance programmes and those who have successfully implemented such programmes.

Concerning beneficial ownership information, non-governmental stakeholders confirmed that the information is publicly available and checks can be done for any company that has submitted the information. However, the website does not support extracting information in a format that facilitates analysis of the information by civil society and other stakeholders. The stakeholders believe that the government lacks the capacity to check the accuracy and completeness of information in the system due to technical limitations and a significant lack of staff. There are cases where the beneficial ownership information was not reported accurately. Non-governmental stakeholders are well aware of the government's plans to improve the beneficial ownership information system. CSOs also raised the matter of charging a fee of AMD 10 000 (EUR 26) for registering changes in the beneficial ownership information, which reduces incentives for legal entities to register changes with the Agency.

Non-governmental stakeholders highlighted the importance of establishing a Business Ombudsman to protect the rights of businesses. The need for a Business Ombudsman is stronger for SMEs and micro enterprises, since, unlike large companies, they do not have sufficient resources to protect their own rights. Areas where protection is needed include adopting new legislation without considering impacted businesses' opinions (especially SMEs) and administering effective legislation. Non-governmental

stakeholders mentioned that the Human Rights Defender (HRD) Office has a division dealing with the rights of businesses and that the HRD is open to developing the function. However, stakeholders believe that the division lacks capacity and is not “visible” in business rights protection. Also, the HRD’s mandate to consider complaints related to violations of the rights of businesses needs to be stated explicitly in the Law on HRD.

Research conducted by the Corporate Governance Centre in 2024 indicated that 81% of SOEs that participated in the survey did not have compliance programmes and 75% admitted to not having corporate codes of conduct or ethics. Regarding the integrity of SOEs, non-governmental stakeholders referred to the Specific Goals included under Activity 4.2 of the Action Plan of the Government’s 2023-2026 Anti-Corruption Strategy, which are linked to adopting the new CGC in 2024. One specific goal is to establish a legal requirement that the new CGC be implemented mandatorily for commercial organisations with state and community participation. The other specific goal seeks to develop and submit for adoption to the National Assembly a package of legislative amendments that will “enhance standards for transparent, merit-based appointment of directors and board members and the standards of board members’ independence; improve accountability, transparency, internal control, and risk management systems, as well as external audit requirements in commercial organisations with state and community participation”. Non-governmental stakeholders mentioned that the Corruption Prevention Commission has implemented a pilot corruption risk assessment in several entities and has drafted a risk assessment methodology. To co-ordinate the implementation of corruption risk assessment and management in SOEs to a broader extent, the CPC needs to receive the mandate through revisions in the Law on the Corruption Prevention Commission, which have been drafted. CPC will also require additional funding and capacity to implement these activities when the authority is granted.

5 Integrity in public procurement

The public procurement legal framework is comprehensive and aligns with the World Trade Organization (WTO) Government Procurement Agreement. The Ministry of Finance centrally manages policy and the e-procurement platform, promoting transparency and accountability. Key improvements include a reduction in direct procurement contracts from 42% of procurement value in 2022 to 4.4% in 2024, alongside increased competition. Nonetheless, Armenia's public procurement as a share of GDP (2.5%) lags behind OECD benchmarks, suggesting issues with data coverage or accounting practices. No sanctions were imposed for procurement-related corruption in 2023–2024, and conflict of interest provisions lack comprehensive coverage. The absence of machine-readable formats and the limited mandatory use of e-procurement restricts broader oversight. Concerns exist regarding nepotism, manipulation of competition, and the opacity of procurement outside the e-platform. Armenia is on a positive trajectory but meaningful progress hinges on stronger enforcement, broader digital integration, and addressing structural weaknesses in oversight and conflict-of-interest management.

Figure 5.1. Performance level for integrity in public procurement is high

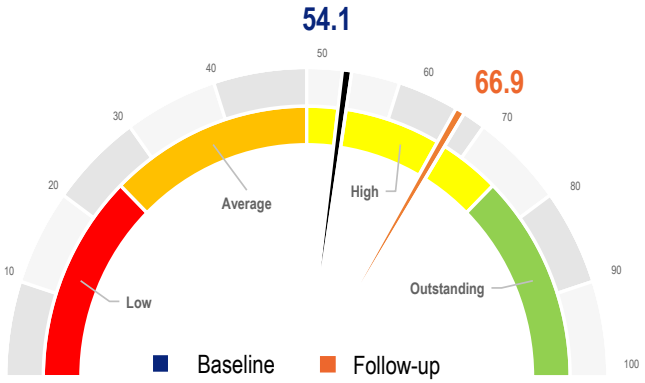
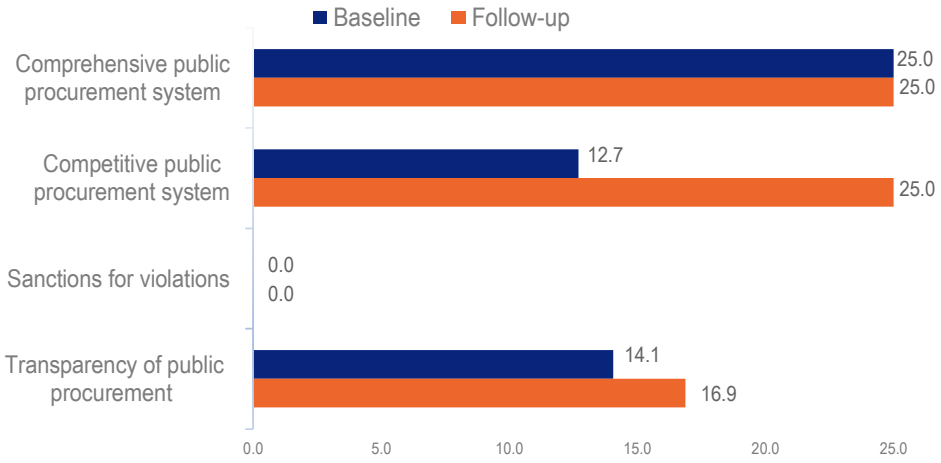


Figure 5.2. Performance level for integrity in public procurement by indicators



Indicator 5.1. The public procurement system is comprehensive

Public procurement in Armenia is regulated by the Law on Procurement of Armenia (LPA), adopted in December 2016, with the latest amendment dated January 2022. The LPA is supported by a comprehensive procurement regulatory framework, including Government Decree 386 (on regulating the e-procurement system), Government Decree 390 (on regulating procurement planning), Government Decree 526 (on approving the procedure for the organisation of the procurement process), and Government Decree 534 (on defining the objects for procurement via e-auctions and regulating respective e-auction procurement procedures). The public-private partnerships and concessions-related procurement are excluded from coverage by the LPA, subject to the Law on Public-Private Partnerships.

The LPA is aligned with the Agreement on Government Procurement of the World Trade Organization (WTO GPA), which Armenia has been a party to since September 2011 (and since June 2015 to the revised WTO GPA of 2012). The procurement system is decentralised, assigning procurement responsibilities to different contracting authorities. The Ministry of Finance is authorised to regulate and co-ordinate the procurement process. The Ministry's Procurement Policy Department plays a central role in drafting policies, providing methodological support, and maintaining the e-procurement system. The key

procurement methods are competitive but single-source procurement is also widely used. The legal framework mandates publishing procurement information on a centralised online portal, ensuring transparency. The law allows for public control in contract management, and the authorities promote civil society engagement in public procurement.

Benchmark 5.1.1.

Public procurement legislation covers the acquisition of works, goods and services concerning public interests by:

Element	Compliance	
	Baseline	Follow-up
A. Publicly-owned enterprises, including SOEs and municipality-owned enterprises	✓	✓
B. Utilities and natural monopolies	✓	✓
C. Non-classified areas of the national security and defence sector	✓	✓

The well-established legal framework covers procurement by publicly owned enterprises, including SOEs and municipality-owned enterprises, and non-classified areas of the defence sector (via the LPA and related secondary legislation), as well as utilities and natural monopolies (through a special Government Decree). Thus, Armenia remains compliant with all three elements A-C.

Article 2 of the LPA provides a detailed definition of contracting authorities subject to law with comprehensive coverage and application regarding areas of economic activities concerning public interest. It covers, *inter alia,* public administration and local self-government bodies, state or community institutions, and non-commercial organisations, including those with more than 50% of state or community shares as well as public organisations from the list approved by the Public Services Regulatory Commission of Armenia (PSRC). The PSRC governs the activities of entities operating in the regulated field of public services, except for persons holding a dominant position in respect of services provided through public network operation (certain sector-specific public services based on special or exclusive rights).

Procurement by utilities and natural monopolies is excluded from direct application of the LPA. They fall under special procurement regulations by the PSRC and are additionally governed by government decrees (the latest related decrees in force are 526-N of 2017 and 273-A of 2020). It is understood that procurement by utilities and natural monopolies is regulated by procurement procedures approved by these organisations. These procedures should not contradict the objectives and principles of the LPA (Article 52) and are subject to a general appeal procedure provided for in it. The monitoring team has not assessed coverage of regulations for specific utilities and natural monopolies. The assessment is based on information provided by the authorities according to which all such organisations have a comprehensive coverage in line with the LPA and provide for competitive and transparent procurement arrangements. The public procurement legal framework encompasses defence and security-related acquisitions under the LPA, even when procurement contains state secrets.

Notwithstanding the above, according to official data published by the Ministry of Finance of Armenia, the total value of public contracts in 2023 was AMD 206 783 million (EUR 540 million). In addition, the authorities note that the total value of public procurement contracts signed by utilities and natural monopolies (excluded from the direct application of the LPA and falling under special procurement regulations by the PSRC) was AMD 21 568 million. These figures represent around 9.6% of government spending and 2.4% of GDP.

In 2024, the total value of public contracts amounted to AMD 257 391 million while the total value of public procurement contracts signed by utilities and natural monopolies was AMD 64 845 million, thus, 10.9% of government spending and 3.2% of GDP, respectively. In OECD member countries, public procurement accounts for approximately 29% of government spending and 13% of GDP on average. These differences may suggest substantial divergences between Armenia and other OECD countries in the coverage of public procurement, collected statistical data or accounting methods for public procurement.

Benchmark 5.1.2.

Element	Compliance	
	Baseline	Follow-up
The legislation clearly defines specific, limited exemptions from competitive procurement procedures	✓	✓

The LPA (Article 23) provides a comprehensive and unambiguous description of limited options for exemption from a competitive procedure. Government Decree 526-N further specifies the conditions and procedures related to these exceptions. At the same time, the number and total value of the contracts awarded directly (6 551 contracts in the amount of AMD 12 878 million, and 9 062 contracts in the amount of AMD 19 431 million) in 2023 and 2024, respectively, out of the number of all contracts (24 126 and 23 174). Although there is still a large number of directly awarded contracts, overall, the data suggest a substantial reduction in public spending on such contracting activities. These data show a positive trend, seen as a highly encouraging development as compared to 2022 when the number and total value of contracts awarded directly (52 450 contracts in the amount of AMD 165 934 million) represented 46% of all contracts (113 054) and 42% of their total value (AMD 390 593 million).

Benchmark 5.1.3.

Element	Compliance	
	Baseline	Follow-up
Public procurement procedures are open to foreign legal or natural persons	✓	✓

The LPA (Article 7) sets a clear rule for equal participation for all (local and foreign legal or natural persons) in a public procurement. Armenia is signatory to the WTO GPA; therefore, public procurement is broadly open to a large group of countries. Participation in a public procurement process can be limited only by a government decree, if necessary, for national security and defence purposes.

The statistical data for 2023-2024 illustrate the openness of the public procurement system to foreign legal persons in Armenia. Notably, foreign legal persons participated in 2 249 procurement procedures with a value of AMD 29 599 million in 2024 and 623 procurement procedures with a value of AMD 18 586 million in 2023. As a result, 118 contracts with a total value of AMD 5.6 million and 410 contracts with a total value of AMD 66 million were awarded to non-resident participants in 2023 and 2024, respectively. A large volume of procurement information is available in the Armenian language only, according to Article 14, LPA but limited information is also published in English and Russian.

Indicator 5.2. The public procurement system is competitive

Procurement data are published annually by the Ministry of Finance. The report contains statistics on public procurement based on procuring institutions, types of procurement procedures (stating the respective participation rate), types of contracts, etc.

During the follow-up assessment period, the Armenian authorities successfully ensured a high level of competition in all competitive procedures, with the highest rates of 6.1 and 7.2 proposals per e-auction process in 2023 and 2024, respectively. In contrast, the regular open competition secured 3.5 and 3.6 proposals per procedure. This reflects substantial progress as compared with 2022 where urgent open competitions secured the highest participation rate of 3.4 proposals per process while regular open competitions had 2.2 proposals per procedure. The share of single-source contracts in all public sector contracts has been reduced.

Benchmark 5.2.1.

Direct (single-source) contracting represents:

Element	Compliance	
	Baseline	Follow-up
A. Less than 10% of the total procurement value of all public sector contracts (100%)	50%	100%
B. Less than 20% of the total procurement value of all public sector contracts (70%)		
C. Less than 30% of the total procurement value of all public sector contracts (50%)		

In 2023 and 2024, contracts awarded directly under the LPA in the amount of AMD 12 878 million and AMD 19 431 million, respectively, represented 6.2% and 7.5% of the total procurement value. The authorities noted that these statistical data exclude procurements related to natural monopolies, such as water, electricity, and gas. The above statistical data compare positively with the data for 2022, when contracts awarded directly were reported to be AMD 165 934 million and represented 42% of total procurement value. It should also be noted that the economic classification of healthcare expenditure planning has been revised in Armenia. Currently, such expenses are accounted for under the category of benefits as per budgetary expenditure classifications. Accordingly, the authorities informed the monitoring team that, due to statistical reasons, in 2022, procurement statistics included budget allocations for health services provided to citizens of Armenia in the total amount of AMD 92 810 million. As these budget allocations should not be classified as public procurement spending, the baseline report direct contracting data were respectively adjusted for the assessment so that the value of directly awarded contracts in 2022 (AMD 73 124 million) represented 25% of total procurement value (similarly adjusted) of AMD 297 783 million.

Benchmark 5.2.2.

The average number of proposals per call for tender is:

Element	Compliance	
	Baseline	Follow-up
A. More than 3 (100%)	30%	100%
B. More than 2.5 (70%)		
C. More than 2 (50%)		
D. More than 1.5 (30%)		
E. Less than 1.5 (0%)		

Based on 2023 statistical data, 502 728 proposals were submitted under 100 704 competitive procurement processes. The average number of proposals per competitive procedure was 5.0. The participation rate varies from 1.1 for the bi-party process to 6.1 for e-auctions. In 2024, 327 911 proposals were submitted under 54 832 competitive procurement processes. The average number of proposals per competitive procedure was 6.0. The participation rate varies from 1.2 for the bi-party process to 7.2 for e-auctions.

Benchmark 5.2.3.

The threshold value for goods contracts:

Element	Compliance	
	Baseline	Follow-up
A. Less than EUR 2,500 equivalent (100%)	100%	100%
B. Less than EUR 5,000 equivalent (50%)		
C. Less than EUR 10,000 (30%)		
D. More than 10,000 (0%)		

The LPA (Article 2) establishes thresholds (procurement base unit) for small value acquisition of goods, works, and services in the amount of AMD 1 000 000 (about EUR 2 340). The total value of the contracts under the threshold placed in 2023 was AMD 900 million. No data were available for 2024.

Indicator 5.3. Dissuasive and proportionate sanctions are set by legislation and enforced for procurement-related violations

The LPA covers certain provisions related to managing conflicts of interest in public procurement. The relevant regulations are also included in the Law on Public Service, setting a general framework applicable to all civil servants as well as Government Decree 526.

The analysis shows that the Armenian public procurement system includes only basic provisions to mitigate the risks of nepotism and corruption. The positive developments in this respect are steps towards identifying beneficiary ownership of participants in procurement processes intended to reduce the above-

cited risks. In terms of enforcement, no sanctions were imposed for corruption offences in public procurement in 2023-2024. The requirement to debar natural persons from the award of public sector contracts in case of conviction for corruption offences has been in place for a long time although direct contracting arrangements and under-threshold procurements appear not to be covered. The corporate liability of legal persons was enacted on 1 January 2023 but despite this, no legal entity was debarred from participating in public procurement in the follow-up assessment period.

Benchmark 5.3.1.

Conflict of interest in public procurement is covered by legislation and applied in practice:

Element	Compliance	
	Baseline	Follow-up
A. There are explicit conflict-of-interest regulations established by law covering all public employees involved in the procurement cycle (from planning to contract completion stage)	X	X
B. Sanctions are routinely imposed on public employees for violations of conflict-of-interest rules in public procurement	X	X
C. There are explicit conflict-of-interest regulations established by law covering all private sector actors involved in procurement	X	X

Public procurement legislation does not seem to establish a comprehensive legal framework for preventing and regulating conflicts of interest for all actors involved across all stages of the procurement cycle. The LPA limits conflict of interest to people involved in evaluating proposals, reviewing appeals, and public monitoring of the procurement processes (Articles 5, 33, and 49, LPA).

As noted earlier (see Benchmarks 2.1.1- 2.1.4), during the follow-up assessment period of 2023-2024, Article 33 LPA was amended to align better with international standards by expanding the definition of a conflict of interest and private interests as well as methods for resolving conflicts. On the procurement side, the legal framework does not seem to recognise different forms of conflict of interest, which may arise at different phases of a procurement process and during the implementation of resulting contracts at the level of different actors both within and outside procuring institutions. Despite formal requirements for analysis of the respective information, the procurement system does not seem to have an effective mechanism to verify the beneficial ownership of participants in the competitive procurement process or the party to which a contract is awarded. Moreover, while directly awarded contracts, by nature, is at risk of corruption and nepotism, the LPA does not seem to require verification of beneficial ownership for such contracts. The monitoring team believes that reliance on the Law on Public Service seems to leave unattended the personnel involved in procurement, who are regulated by local self-government bodies; state or community institutions; non-commercial organisations, including those with more than 50% of state or community shares; and public organisations from the list approved by the Public Services Regulatory Commission of Armenia (PSRC), who are not perceived to be public officials.

Regarding sanctions, on 14 March 2024, the CPC initiated administrative proceedings against a mayor for signing procurement contracts with a company involving his relative. On 26 March 2024, the CPC imposed a fine in the amount of AMD 300 000 (EUR 716). No other information confirming the routine application (for which at least three case examples are required) of sanctions for violations of conflict-of interest rules in public procurement was provided by the authorities. Thus, the country is not compliant with element B. Additionally, beyond a limited discussion on a potential conflict of interest by participants in Article 7, LPA,

the involvement of affiliates at different phases of the procurement process does not appear to be well defined, as required by element C of the benchmark. No effective control mechanism seems to exist either.

Benchmark 5.3.2.

Element	Compliance	
	Baseline	Follow-up
Sanctions are routinely imposed for corruption offences in public procurement.	X	X

Armenian authorities confirmed that no sanctions were imposed for corruption offences in public procurement in 2023 or 2024. Non-governmental representatives noted that in the annual report on corruption crime investigation published by the Prosecutor General's Office of Armenia, statistics were provided only with reference to a specific article of the Criminal Code. As the Code did not include a specific article on corruption related to public procurement, statistical data on corruption crimes in procurement were not explicitly revealed in the report.

Benchmark 5.3.3.

The law requires debarment from the award of public sector contracts:

Element	Compliance	
	Baseline	Follow-up
A. All natural persons convicted of corruption offences	X	X
B. All legal persons and affiliates of legal persons sanctioned for corruption offences	N/A	X

According to paragraph 1, sub-paragraph 3, Article 6, LPA, a person or a representative of an executive body is not eligible to participate in procurement when they have been convicted (less than five years before submission of a proposal) for receiving *"a bribe, giving a bribe or mediation in bribery and crimes against economic activity"* provided for by law. According to the guide, "corruption offences" include bribery of national public officials, bribery of foreign public officials and officials of international public organisations, embezzlement, misappropriation or other diversion of property by a public official, trading in influence, abuse of functions by a public official, illicit enrichment, bribery in the private sector, embezzlement of property in the private sector, and laundering of proceeds of crime. Thus, Article 6 of the LPA seems to provide narrower coverage, referring explicitly to "*receiving a bribe, giving a bribe or mediation in bribery"*. Moreover, the cited provisions do not seem to cover direct contracting arrangements and under-threshold procurement as the provisions explicitly refer to the submission of a proposal, which is not always the case with these types of procurement. It is understood that neither the standard contract templates used in public procurement nor actual contracts include provisions focused on preventing prohibited practices, such as corruption, fraud or money laundering. In 2023 and 2024, a list of natural or legal persons debarred from (ineligible for) public procurement did not include any persons debarred from participation based on a conviction for corruption offences (see Benchmark 5.3.4). Considering this, the country is not compliant with elements A and B.

Benchmark 5.3.4.

Debarment of all legal and natural persons convicted of corruption offences from the award of public sector contracts is enforced in practice:

Element	Compliance	
	Baseline	Follow-up
A. At least one natural person convicted of corruption offences was debarred	X	X
B. At least one legal person or an affiliate of a legal person sanctioned for corruption offences was debarred	N/A	X

The authorities did not provide information to demonstrate compliance with the requirement on the debarment of at least one natural or legal person convicted of corruption offences (elements A and B). However, the State Supervision Service informed the monitoring team that, following analysis and in the course of ongoing monitoring in 2023-2024, certain participants connected to ineligible individuals were found submitting false information while being awarded 121 public procurement contracts in the amount of AMD 2 265 million. Seventy-nine of these contracts, valued at AMD 2 098 million, were unilaterally terminated by the contracting authorities.

As a result of procurement oversight activities, 24 economic operators were included in the list of participants banned from participating in procurement procedures. In accordance with the procedure defined by law, the State Supervision Service submitted the materials related to the mentioned procedures to the Prosecutor General's Office. As a result, nine criminal proceedings were initiated concerning 26 economic operators.

Indicator 5.4. Public procurement is transparent

The e-procurement platform (ARMEPS) is widely used by contracting authorities (a large part of them are connected to the system) and businesses (Ministry of Finance of Armenia, 2025[30]). As of December 2024, about 23 200 users are registered with ARMEPS, which is equivalent to about 19% of all companies registered in Armenia, excluding individual entrepreneurs, while some are registered as ARMEPS users. Conducting e-procurement through ARMEPS is regulated by Government Decree 386. Key legal information regarding procurement (laws and international agreements, Government and Prime Minister Decrees, Orders of the Minister of Finance), procurement document templates, guidance notes, manuals, and instructions are publicly available on the centralised platform of the Ministry of Finance (Ministry of Finance of Armenia, 2025[31]). In addition, all procurement plans and procurement opportunities are also posted on this platform. These documents include tender notices, tender documents, minutes of evaluation reports, etc. Under the umbrella of the Open Government Partnership and as a commitment under its Action Plan for 2022-2024, the authorities' intention is to create a single platform where procurement information will be published free of charge and automatically. The platform is also expected to be made interoperable with the beneficial ownership register, allowing users to easily retrieve participants' beneficial ownership information in public procurement tenders. The authorities have been using and regularly enhancing their e-procurement platform, covering the entire investment cycle from planning through selection processes to contract completion, ensuring a substantial degree of transparency. An e-auction module has been operational since 2018. Notices and procurement documents from all contracting authorities registered with ARMEPS are available on the Ministry of Finance websites. However,

procurement data were not yet available in a machine-readable format during the follow-up assessment period. And, while a large number of contracting authorities are connected to the system and appear to be using it regularly, the electronic procedures remain non-mandatory for all contracting entities.

Benchmark 5.4.1.

An electronic procurement system, including all procurement methods:

Element	Compliance	
	Baseline	Follow-up
A. Is stipulated in public procurement legislation	X	X
B. Is accessible for all interested parties in practice	✓	✓

According to the LPA, within the scope of the functions defined by law, communication between procuring entities and economic operators may be carried out electronically, and the announcement and invitation provided electronically. Government Decree 386 establishes a procedure for conducting e-procurement through an open tender except for tenders carried out in two stages, procurement through price quotation, and direct awards in case of emergency. Therefore, electronic procedures are an option, not an obligation. The overall volume of public procurement in Armenia (see Benchmark 5.1.1) also suggests that ARMEPS does not record a substantial part of public procurement. As a result, the country remains non-compliant with element A in the follow-up assessment period. Nevertheless, it should be noted that the e-procurement system ARMEPS is widely used, and a large number of contracting authorities are connected to it. The aforementioned government decree lists contracting entities that are required to procure via the platform. However, this list does not cover all entities defined by the LPA nor those from the PSRC approved list.

Regarding accessibility (element B), ARMEPS provides unrestricted access to all interested parties, allowing for free and simple registration with relevant documents and video tutorials. Procuring entities can also register with the system without any difficulties. The system features an interface in three languages: Armenian, Russian, and English. All procurement information is published in Armenian (with some information available also in Russian and English) on the platform.

Benchmark 5.4.2.

An electronic procurement system encompasses the following procurement stages in practice:

Benchmark element	Compliance	
	Baseline	Follow-up
A. Procurement plans	✓	✓
B. Procurement process up to contract award, including direct contracting	✓	✓
C. Lodging an appeal and receiving decisions	X	✓
D. Contract administration, including contract modification	✓	✓

The functionalities of ARMEPS encompass all key procurement stages, including publishing notices, making tender documents available, receiving proposals, recording all aspects of the proceedings, and providing key information on contract implementation. Thus, the system complies with three

elements (A, B and D) of the benchmark. Contracting authorities publish all procurement plans on the unified platform of the Ministry of Finance (2025[30]). Announcements of procurement procedures, publication of procurement documents, and minutes of evaluation committees' sessions as well as contract awards, including direct contracting, are also made through the platforms. Key information on the implementation of contracts, including the complete text of signed contracts, their modifications, completion certificates, and invoices, is also posted on the mentioned platform.

The procurement appeal process (element C) is not digitalised as part of ARMEPS. However, following the abolition of the extrajudicial procurement appeal system in June 2022, all procurement-related appeals are currently reviewed solely by first-instance civil courts of general jurisdiction. The process is governed by the Civil Procedure Code. Chapter 27 of the Code covers proceedings related to procurement disputes (especially in Articles 234.5-234.12). Decision protocols are published in the centralised judicial information system, namely DataLex (2025[32]). According to the Assessment Framework, essential information about appeals can be processed either in the e-procurement system or another e-government system (centralised procurement website, e-court system, etc.) to which the e-procurement system directs public procurement participants. Thus, the existence of a separate platform is deemed to ensure compliance with the benchmark. The authorities confirmed that information on the DataLex includes the court's ruling on procurement complaints, including case details, decision outcome, reasoning, and any remedies or actions required. Summaries of the final court decisions are also published on the Ministry of Finance (2025[31]). Thus, the country is compliant with the respective element.

Benchmark 5.4.3.

The following up-to-date procurement data are publicly available online on a central procurement portal free of charge (except for a nominal registration or subscription fee, where applicable):

Element	Compliance	
	Baseline	Follow-up
A. Procurement plans	✓	✓
B. Complete procurement documents	✓	✓
C. The results of the evaluation, contract award decision, and final contract price	✓	✓
D. Appeals and results of their review	✓	✓
E. Information on contract implementation	✓	✓

Contracting authorities publish all procurement plans on the unified platform of the Ministry of Finance (2025[30]). Announcements of procurement procedures and documents, minutes of evaluation committees' meetings, and decisions on contract awards, including information on the final contract price, are published on the platform. These publications also cover contracts signed via the direct contracting procedure. Key information on the implementation of contracts, including the complete text of signed contracts, their modifications, completion certificates, and invoices, is publicly available (elements A, B, C and E).

As noted in Benchmark 5.4.2 above, appeals and results of their reviews (element D) are published on the centralised judicial information system – DataLex (2025[32]). The authorities confirmed that the court's rulings on procurement complaints include case details, decision outcome, reasoning, and any remedies or actions required. Summaries of the final court's decisions are also published on the Ministry of Finance's official website. Thus, Armenia is deemed to be compliant with element D.

Benchmark 5.4.4.

The following up-to-date procurement data are publicly available online on a central procurement portal free of charge (except for a nominal registration or subscription fee, where applicable) in a machine-readable format:

Element	Compliance	
	Baseline	Follow-up
A. Procurement plans	X	✓
B. Complete procurement documents	X	X
C. The results of the evaluation, contract award decision and final contract price	X	X
D. Appeals and results of their review	X	X
E. Information on contract implementation	X	X

While a large volume of procurement-related information is available on the ARMEPS platform and data are relevant and usually provided promptly, they are not always published in machine-readable formats – with the exception of procurement plan data, which are available in Excel format. This limits the ability of interested parties to easily obtain and analyse data, and monitor public procurement processes and their outcomes or assess performance under the signed contracts. Thus, the country is not compliant with elements B, C and E while element A is deemed to be compliant. The authorities recognise this issue and, thus, are modernising the e-procurement system as one of the key priorities in the Public Finance Management Reform Strategy. The Strategy aims to expand access to the system and available data, include more procuring entities, and introduce online monitoring of contract progress with a focus on time, quality, and price. One of the key planned development directions outlined in the Concept of Development of the Procurement System and the respective Action Plan (the Prime Minister Decree 977-L, August 25, 2022) is the digitalisation and creation of a new e-procurement system, which encompasses the previously stated objectives.

Information regarding appeals and their results is published on the DataLex platform and is easily searchable. However, the monitoring team could not establish whether the data are provided in a machine-readable format (e.g. CSV, JSON, XML) or available for automated data extraction. Thus, the country is considered non-compliant with element D.

Assessment of non-governmental stakeholders

In response to the questionnaire and during the onsite visit, NGOs expressed concerns regarding corruption-related risks in the public procurement system. Many of them are related to: (i) limited regulations and lack of effective control over procurement by public organisations regulated by the Public Services Regulatory Commission outside of the detailed framework of LPA (except those privately owned); (ii) widely spread nepotism (with conflict of interest not effectively controlled), especially at regional level; (iii) weak institutional capacity for running procurement and contract management, and low overall risk awareness by procuring agencies; (iv) use of targeted specifications and requirements under an umbrella of competitive processes to be met only by one (the preferred) participant; (v) undue use of formal reasons for rejection of offers by participants who offer good value for money in favour of preferred participants; (vi) unreliability of some information published on e-procurement portal due to lack of effective quality control mechanism; (vii) incomplete and unreliable procurement plans, which are subject to frequent and uncontrolled modifications. Official statistics and anecdotal evidence support many of the above-listed concerns. Some concern was raised regarding a broad use of non-competitive and unregulated procurement methods for award of public contracts via so-called, “non-purchase expense”, reportedly defined in Government Decree 706.

6 Independence of the judiciary

The Supreme Judicial Council (SJC) is a constitutional body playing a vital role in judicial appointments, evaluation, training, and discipline. Although the recent resignation of its chairperson has sparked concerns about executive interference and its independence. The President and Parliament have continued to influence judicial appointments and promotions. The Council's recommendations lack justification, raising concerns about the merit-based selection of judges. No changes have been introduced to the appointment of court presidents, who continue to be elected by political decision-making bodies based on the SJC's proposals. Notable progress was made in 2023 with the introduction of an appeal mechanism for disciplinary decisions, but implementation has been delayed. There is an urgent need to clearly define the legal grounds for judicial disciplinary liability, especially those affecting judges' freedom of expression, and to ensure sanctions are proportionate, with dismissal of judges used in practice as a last resort.

Figure 6.1. Performance level for the independence of the judiciary is high

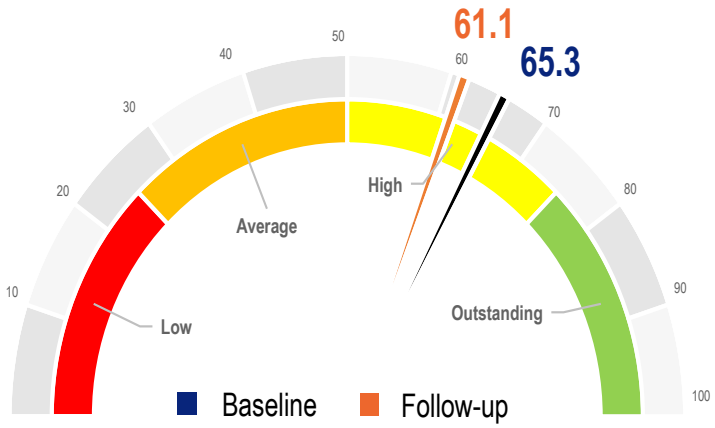
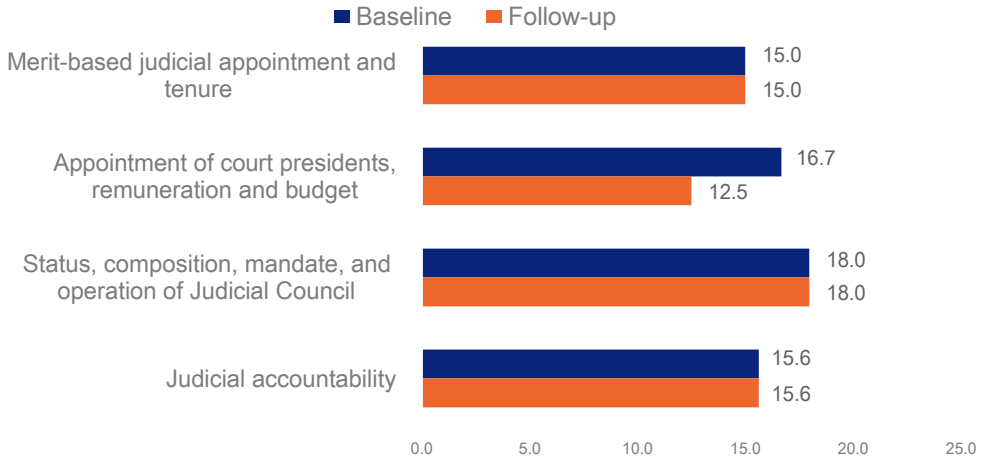


Figure 6.2. Performance level for the independence of the judiciary by indicators



Indicator 6.1. Merit-based appointment of judges and their tenure is guaranteed in law and practice

The judicial system and status of judges in Armenia are governed by the Constitution (2015[33]) and the Judicial Code (2018[34]). Judges serve until the legal retirement age with no initial probationary period established by legislation. Appointments to judicial positions follow specific procedures: judges of the Court of Cassation are appointed by the President based on nominations from the National Assembly, which must approve candidates with at least three-fifths of votes from all Deputies. These candidates are proposed by the Supreme Judicial Council (SJC). For judges of first-instance courts and courts of appeal, appointments are made by Presidential Decree upon SJC recommendations.

Since the Baseline Monitoring Report, political bodies have continued to play a significant role in judicial appointments. While the President retains the authority to appoint judges to first-instance and appellate courts, the Judicial Code has not been revised to include specific grounds for rejecting proposed

candidates. Similarly, no clear criteria have been established for rejecting candidates for the Court of Cassation when Parliament reviews their nominations. While judicial vacancies were advertised online and open to applications from eligible candidates, the SJC's candidate recommendations lack justification, raising concerns about transparency and merit-based decision-making in selection and promotion.

Benchmark 6.1.1.

Irremovability of judges is guaranteed:

Element		Compliance	
		Baseline	Follow-up
A.	Judges are appointed until the legal retirement age (100%) OR	100%	100%
B.	Clear criteria and transparent procedures for confirming in office following the initial (probationary) appointment of judges are set in the legislation and used in practice (70%)		

Note: The country is compliant with one of the alternative elements A-B if the respective procedure applies to all judges. If different procedures apply to different categories of judges, the country's score is determined by the element with the lower number of points.

The Baseline Monitoring Report confirmed the permanent tenure of judges enshrined by the Constitution. Specifically, according to Article 166 of the Constitution, judges are appointed to hold office until they reach the age of 65. No initial probationary appointment is set by the legislation, and judges are appointed directly to their positions without a trial period. Additionally, since judges are appointed until the legal retirement age, there is no procedure for confirming judges in office after their initial appointment. Thus, Armenian legislation remains compliant with element A of the benchmark.

Benchmark 6.1.2.

A Judicial Council or another judicial governance body plays a vital role in the appointment of judges, and the discretion of political bodies (if involved) is limited:

Element	Compliance	
	Baseline	Follow-up
A. The Judicial Council or another judicial governance body directly appoints judges. The role of Parliament or President (if involved at all) is limited to endorsing the Council's decision without the possibility to reject it (100%) OR	X	X
B. The Judicial Council or another judicial governance body prepares a proposal on the appointment of a judge that is submitted to the Parliament or President, who may reject it only in exceptional cases on clear grounds provided in the legislation and explained in the decision (70%) OR		
C. The Judicial Council or another judicial governance body reviews all candidates for judicial office and makes a justified recommendation to the relevant decision-making body (50%)		

Note: The country complies with one of the alternative elements A-C if the respective procedure applies to all judges. If different procedures apply to other categories of judges, the country's score is determined by the element with the lower number of points.

The Supreme Judicial Council (SJC) of Armenia serves as a pivotal judicial governance body, established under the Constitution and operating independently from the executive and legislative branches. It is entrusted with a clearly defined mandate, including control over its budget, and plays a central role in the selection of judges across various court levels, including first-instance courts, appellate courts, and the Court of Cassation. As described in the Baseline Monitoring Report, appointment procedures in the Armenian judiciary vary by court type. For the Court of Cassation, judges are appointed by the President following nominations by Parliament. Judges for the first instance and appellate courts are appointed directly by the President based on recommendations from the SJC (Articles 115–117, Judicial Code).

Despite its extensive mandate, the SJC lacks the direct authority to appoint judges, and its proposals are not binding on the President or Parliament, impacting its compliance with element A. In practice, if the President objects to a candidate to the first-instance or appeal courts proposed by the SJC, the Council must convene a closed session to review the objections. The monitoring team is unaware of procedures regulating in-camera proceedings, nor are any documents or issues discussed in the closed sessions usually made publicly available. Following open voting, if the SJC rejects the objections, the President must either issue a decree appointing the candidate within three days or refer the matter to the Constitutional Court. If the Constitutional Court determines that the SJC proposal is "consistent with the Constitution", the President must issue a decree appointing the candidate within three days. From 2023 to 2024, the President rejected six candidates proposed for positions in first-instance and appeal courts. However, five of these candidates were subsequently appointed by the President after being re-submitted by the SJC (with no reviews requested from the Constitutional Court), and the SJC rejected one candidate based on the objections it received. Similar procedures apply to candidates of the Cassation Court. Namely, through a three-fifths majority vote in a secret ballot, the National Assembly selects candidates proposed by the SJC. Upon decision, the National Assembly sends its proposal for a candidate to the President, who either appoints the candidate or returns the proposal with its objections to the National Assembly (2017[35]). The President could apply to the Constitutional Court if the National Assembly does not accept the objection. The legislation does not provide clear criteria for the exceptional rejection of judicial candidates or require detailed public reasoning from the President or Parliament to prevent

improper political or other considerations from influencing decisions. Thus, the country is not compliant with element B. Concerning element C, while the SJC conducts thorough reviews of judicial candidates, the examples of proposals regarding judicial candidates (2024[36]) submitted to the decision-making bodies in 2023-2024 lacked explanation and justifications, leading to non-compliance with the element.

The monitoring team reiterates its recommendation to strengthen legislative safeguards that limit the role of political decision-making bodies in judicial appointments. Armenia is also recommended to enhance the role of the SJC by ensuring that its proposals are accompanied by detailed reasoning and made accessible to Parliament, the President, and the general public (to the greatest extent possible). Such measures would prevent political preferences from affecting judicial appointment procedures and promote transparency in the judiciary (see Indicator 6.3.3).

Benchmark 6.1.3.

A Judicial Council or another judicial governance body plays a vital role in the dismissal of judges, and the discretion of political bodies (if involved) is limited:

Element	Compliance	
	Baseline	Follow-up
A. The Judicial Council or another judicial governance body directly dismisses judges. The role of Parliament or President (if involved at all) is limited to endorsing the Council's decision without the possibility to reject it (100%) OR	100%	100%
B. The Judicial Council or another judicial governance body prepares a proposal on the dismissal of a judge that is submitted to the Parliament or President, which may reject it only in exceptional cases on clear grounds provided in the legislation and explained in the decision (70%) OR		
C. The Judicial Council or another judicial governance body reviews all proposals for the dismissal of judges and makes a justified recommendation to the relevant decision-making body (50%)		

Note: The country is compliant with one of the alternative elements A-C if the respective procedure applies to all judges. If different procedures apply to different categories of judges, the country's score is determined by the element with the lower number of points.

As confirmed by the Baseline Monitoring Report, the Constitution and the Judicial Code regulate the termination of a judge's powers in Armenia. The legislation mandates that the SJC is solely responsible for dismissing judges based on the grounds outlined in Article 159 of the Judicial Code. These grounds include violating incompatibility requirements, committing significant disciplinary violations, engaging in political activities, and failing to perform duties due to temporary incapacity. Additionally, termination can occur due to physical impairment, resignation, attaining the mandatory legal age, criminal conviction, loss of citizenship or death (Article 160, Judicial Code). Thus, the legal framework excludes political bodies' involvement in dismissing judges. The authorities confirmed that changes have not been introduced to the respective legislation in the follow-up assessment period; thus, Armenia remains compliant with the benchmark (100% of the score).

Benchmark 6.1.4.

Judges are selected:

Element	Compliance	
	Baseline	Follow-up
A. Based on competitive procedures, that is, when vacancies are advertised online, and any eligible candidate can apply	✓	✓
B. According to merits (experience, skills, integrity)	X	X

According to the Baseline Monitoring Report, the selection process of judicial positions in Armenia involved an initial stage of forming a pool of candidates from which the final selections are made when vacancies arise (Chapter 16, Judicial Code). This preliminary stage was considered fully in line with the requirements of element A, requiring recruitment via a competitive procedure. Namely, the SJC publishes vacancies online, providing detailed information on requirements, application deadlines, and the number of positions available, allowing eligible candidates to apply within a month from the publication date. At the time of follow-up monitoring, open vacancies were publicly available. Thus, Armenia remains compliant with element A.

The Baseline Monitoring Report identified shortcomings in Armenia's judicial merit-based selection, particularly the lack of procedural guarantees for merit-based decision-making (element B). With no changes since the baseline assessment period, the selection process remains a two-step procedure: a written examination led by an evaluation committee, followed by an interview with the SJC. After the written examination, the Judicial Department submits a consolidated list of candidates to the SJC, which is also published online with details about the candidate's education and professional work experience (Article 107, Judicial Code).

At the interview stage, candidates are assessed on various skills and qualities, including professional experience, motivation, awareness of legal requirements, self-control, integrity, conduct, reputation management, responsibility, listening and communication skills, sense of justice, and analytical abilities (Article 108, Judicial Code). Scores obtained during the selection process may influence decision recommendations for judicial positions when vacancies arise. However, there are no formal criteria for assessing candidates during interviews, and the discussions are not structured around binding selection criteria. The authorities note that SJC members are provided with an evaluation matrix although it serves only as a guideline and is not mandatory to score candidates uniformly. Final decisions to include candidates in the reserve pool also lack justification. Discussions and voting are also conducted in closed session, with only total votes for and against being published on the SJC's website. The legislation does not establish a right to seek any legal remedies against selection or promotion decisions.

A mandatory integrity check conducted by the CPC is another key component of the selection process. The CPC's advisory opinion and written examination scores are included in the candidates' application documents submitted to the SJC. In 2023 and 2024, approximately 10% (6 out of 63 candidates) of candidates were selected despite receiving negative integrity reviews from the CPC. Civil society has repeatedly raised concerns about the lack of transparency in addressing integrity issues flagged by the CPC during judicial appointments. The monitoring team reiterates that insufficient justification for integrity allegations, combined with the absence of reasoning in the SJC's final decisions, continues to undermine public confidence in merit-based selection and transparency in judicial appointments during the follow-up monitoring period. These concerns are further exacerbated by allegations of judicial appointments involving individuals with criminal history (as suspects having dropped charges) and active political

affiliations (including donations to the ruling party and other personal or economic ties). Some of the appointed judges have also been alleged to be from the Prosecutor's Office, Judicial Department and the Ministry of Justice (Factor News, 2024[37]). Civil society has been highly critical of certain appointment decisions in 2023-2024 (see also NGO opinions). Armenia remains non-compliant with element B and authorities are encouraged to strengthen safeguards for merit-based judicial appointments to address the above-mentioned criticisms.

Benchmark 6.1.5.

Judges are promoted:

Element	Compliance	
	Baseline	Follow-up
A. Based on competitive procedures, that is, when vacancies are advertised online, and any eligible candidate can apply	✓	✓
B. According to merits (experience, skills, integrity)	X	X

The Baseline Monitoring Report confirmed Armenia's compliance with element A. In line with the Judicial Code (Chapter 17), following the online publication of an announcement regarding specific positions, specialisation, and dates, the SJC creates lists of candidates for promotion to the courts of appeal or the Cassation Court. The authorities provided examples of the published vacancies for judicial positions in 2023 and 2024, respectively.

Regarding promotions based on merit (element B), the Judicial Code requires the SJC to consider the skills and qualities necessary for judges to serve in courts when compiling a promotion list effectively. In addition, the SJC should also consider the CPC's advisory opinions on candidates' integrity and judges' performance evaluation (Article 124, Judicial Code). This evaluation includes such aspects as the quality and professionalism of judicial work, including justifying judicial decisions and presiding over court sessions according to legal standards, as well as the effectiveness of judicial work (e.g. efficient workload management, timely examination of cases, etc.). Judges' ethics and conduct are evaluated, focusing on adherence to conduct and ethics rules, contributions to public perception and confidence in the court, and respectful relationships with other judges and court staff. However, as the Baseline Monitoring Report concluded, the procedure lacks clear pre-defined criteria for assessing the mentioned aspects by the SJC, its final decisions do not provide sufficient reasoning, and the possibility of legal remedy of the final decision is not established by law. The Venice Commission has also outlined that the existing evaluation system fails to provide the objective data necessary for merit-based promotions (Venice Commission, 2024[38]). The monitoring team believes that the decision-making process for Cassation Court judges at the National Assembly remains even more vulnerable to political influences. With no changes in the respective legislation concerning the promotion process, Armenia remains non-compliant with element B.

Indicator 6.2. The appointment of court presidents and judicial remuneration, and the budget do not affect judicial independence

The chairpersons of the first instance and appellate courts of Armenia are appointed by the President of the Republic based on recommendations from the Supreme Judicial Council, following the selection of candidates from among members of the respective courts. Similarly, the Chairperson of the Court of Cassation is elected by the National Assembly through a majority vote of all Deputies, following a

recommendation from the Supreme Judicial Council and drawn from the ranks of the Court of Cassation's members.

During the follow-up assessment period in Armenia, court presidents continue to be elected by political decision-making bodies upon the proposals of the Supreme Judicial Council and not by the judges of their respective courts. The existing legal provisions also do not allow self-nomination by judges from the respective courts, thereby increasing the risk of arbitrary decisions or other undue considerations and institutional blockage. The procedure lacks standards for an open, competitive, and merit-based selection process. The amount of funding allocated to the judicial system in 2024 was 18% less than the requested amount and considered insufficient by the judiciary.

Benchmark 6.2.1.

Court presidents are elected or appointed:

Element	Compliance	
	Baseline	Follow-up
A. By the judges of the respective court or by the Judicial Council or another judicial governance body	X	X
B. Based on an assessment of candidates' merits (experience, skills, integrity)	X	X
C. In a competitive procedure	X	X

In the baseline assessment period, Armenia was not compliant with benchmark elements as chairpersons (court presidents) were appointed by the President or the National Assembly. There have been no changes in appointment procedures in the follow-up assessment period. Namely, the appeal court and Cassation Court presidents are elected for three years and six years, respectively, from among members of the respective courts upon recommendations from the SJC (Articles 121-129, 134, Judicial Code) (element A). As a first step, the Judicial Department provides the Supreme Judicial Council with a list of eligible judges from the respective court of first instance who align with the following specific criteria: judges must have at least three years of judicial experience, no record of disciplinary penalties, no prior appointment as chairperson of the court within the past three years and must not be current members of the SJC. The SJC reviews the personal files of these judges and may invite them for interviews although the latter is not a mandatory step. The evaluation process considers key qualities required for effective leadership as a chairperson, including professional reputation, interpersonal conduct, attitude toward colleagues in performing judicial duties, and organisational and managerial skills. The selection is finalised through an open vote by SJC members, conducted in a closed session, with the candidate receiving the majority vote being proposed to the President or the National Assembly. Neither the selection nor the appointment has standard and transparent pre-defined criteria to ensure a merit-based selection process (element B). The procedure for appointing court presidents cannot be considered competitive due to the lack of an open call for candidates and a formal application process for appointing court presidents (element C). Notably, the SJC has exclusive authority over selecting candidates from the "long list" compiled by the Judicial Department, and existing legal provisions do not allow judges from respective courts to self-nominate. The monitoring team believes that direct selection of candidates increases the risk of arbitrary decisions or other undue considerations. Implementing a competitive and transparent selection process could help mitigate the risk of institutional blockages in cases when the initially selected judge declines the position.

Armenia confirms that in 2023-2024, no legislative changes in the respective legislation were made; thus, the country remains non-compliant with all benchmark elements. The monitoring team reiterates that the

Supreme Judicial Council should be key in appointing court presidents. Similarly to initial appointments and promotions of judges, these decisions should be bound by pre-established and transparent criteria, thereby ensuring independence from any undue considerations, including political influence, and increasing process transparency. Both judges and civil society also criticise the lack of transparency and justification in judicial promotion decisions, particularly the absence of reasoning behind these decisions. Judges note that the lack of justification prevents them from challenging these decisions in administrative courts, especially when judges with negative evaluations are still promoted. Civil society provided an example concerning the transition of a former National Assembly deputy to the judiciary after being appointed as a judge in the Anti-Corruption Court's civil chamber and subsequently promoted to the position of president of the same court in less than a year (between June 2022 and March 2023). In the absence of clear and transparent reasoning for SJC proposals and final decisions, this rapid progression raises concerns about transparency and merit-based criteria in certain high-level judicial appointments.

Benchmark 6.2.2.

The budgetary funding allocated to the judiciary:

Element	Compliance	
	Baseline	Follow-up
A. Was not less than 90% of the amount requested by the judiciary or, if less than 90%, is considered sufficient by the judiciary	✓	X
B. Included the possibility for judicial representatives to participate in the consideration of the judicial budget in the Parliament or the Parliament's committee responsible for the budget	✓	✓

In 2023, funding allocated to the judicial system amounted to AMD 16 074 535, which is 3.8% higher than requested. However, the judiciary's budget in 2024 was significantly lower than requested, with a shortfall of AMD 4 397 881 (18% less than the requested amount). Authorities note that this reduction is attributed to several factors: a decrease in postal service expenses, a substantial cut in construction costs due to a new policy eliminating the need for capital construction, and a decision not to increase the number of judges and staff as initially proposed. Thus, the monitoring team considers Armenia not compliant with element A.

As regards the possibility for judicial representatives to participate in the consideration of the judicial budget, according to Article 38 of the Judicial Code, the position of the Supreme Judicial Council on the budget bid or the medium-term expenditure programme is presented in the National Assembly by the SJC Chairperson or, upon his/her assignment, the head of the Judicial Department. The SJC sets up the Judicial Department and its head can be considered a judicial representative. The authorities have not reported any changes in the respective legislation; thus, Armenia complies with element B in the follow-up assessment period.

Benchmark 6.2.3.

The level of judicial remuneration:

Element	Compliance	
	Baseline	Follow-up
A. Is fixed in the law	✓	✓
B. Excludes any discretionary payments	✓	✓

According to the Baseline Monitoring Report, judges' salaries in Armenia are determined by multiplying a base salary rate, set annually by State Budget Law, with a coefficient that varies based on the judge's level and specialisation, as outlined in the Law on Remuneration of Persons Holding Public Office and Public Service Positions of Armenia (element A). The Law states that a base salary for a given year cannot be set lower than the base salary of the previous year. Judges also receive various salary supplements based on their years of service, specialisation, and the risks associated with their positions. Judges are granted a 2% supplement for each year of service, which cannot exceed 30% of the basic salary. Additional supplements are provided depending on their court level and responsibilities in line with the Law. In the follow-up reporting period, Armenia implemented changes to align judges' remuneration with their status and responsibilities as part of its 2022-2026 Judicial and Legal Reforms Strategy by amending Article 13 of the Law on Remuneration of Persons Holding Public Offices and Public Service Positions. These amendments introduced a 60% salary supplement for judges in the first instance, bankruptcy, and administrative courts. Similarly, Anti-Corruption Court judges are entitled to a 60% salary supplement due to high risks and specialisation requirements. Additionally, appeal court judges and individual judges examining civil cases initiated based on claims for confiscation of property receive a 55% supplement to their official salaries. Judges of the Court of Cassation, including its president and chamber presidents, receive a 50% supplement. SJC Decision 84-O-169 also provides extra compensation for overtime hours worked by judges and court personnel of first-instance courts handling complaints and petitions filed under pre-trial proceedings. These overtime hours are documented in separate reports and compensated on the basis of salary per hour worked. As confirmed by the Baseline Monitoring report, legislation does not provide for discretionary payments (element B).

The monitoring team notes that based on the provided information (see Table 6.1), a significant portion of judges' remuneration – on average over 33-37% – is composed of supplements rather than the base salary. Judges and civil society organisations agree that reliance on supplements raises concerns about long-term financial and social security for judges and highlights the need for stable remuneration structures. While recent changes have been made to enhance a judicial career's attractiveness, interlocutors onsite suggest that judicial remuneration remains less competitive compared to other legal professions, such as prosecutors (e.g. a first-instance court judge's salary is approximately 2.5% higher than that of a regional prosecutor while the salary of cassation court judges is almost equal to the Yerevan city prosecutor's salary).

Table 6.1. Remuneration of judges by level of court and components

Amount	Judge of the Court of Cassation	Judge of the Court of Appeal	Judge of First-Instance courts of General Jurisdiction and specialised courts
Base amount	AMD 956 800 (EUR 2 222)	AMD 915 200 (EUR 2 125)	AMD 832 000 (EUR 1 932)
Additional supplements	AMD 478 400 (EUR 1 100)	AMD 503 360 (EUR 1 168)	AMD 499 200 (EUR 1 159)

Total amount	AMD 1 435 200 (EUR 3322)	AMD 1 418 560 (EUR 3293)	AMD 1 331 200 (EUR 3 091)

Source: Supreme Judicial Council.

Indicator 6.3. The status, composition, mandate, and operation of the Judicial Council guarantee judicial independence and integrity

In 2024, the Supreme Judicial Council and three additional judicial governance bodies (as defined by the Assessment Framework specifically) were active, playing an important role in the selection, promotion, evaluation, and disciplinary accountability of judges. The recent resignation of the SCJ Chairperson underlines the need to reinforce the SCJ's independent status while ensuring its full autonomy. Additional measures to strengthen the integrity of SCJ members could also contribute to increasing its independence.

At least half of each of the four judicial governance bodies is composed of judges, elected by their peers from various tiers of the judiciary. However, the Ethics and Disciplinary Commission and Training Commission lacked a sufficient number of non-judicial members as of December 2024. Furthermore, decisions issued by the Supreme Judicial Council and the Training Commission did not provide explanations for the rationale behind their decisions. In contrast, the Commission for Performance Evaluation of Judges offered only limited reasoning in its decisions.

Benchmark 6.3.1.

Element	Compliance							
	Baseline				Follow-up			
	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission
The Judicial Council and other judicial governance bodies are set up and function based on the Constitution and/or law that defines their powers.	✓	✓	✓	✓	✓	✓	✓	✓

According to the Baseline Monitoring Report, the four existing judicial governance bodies – the Supreme Judicial Council, Ethics and Disciplinary Commission, Training Commission, and Performance Evaluation Commission – align with the benchmark requirements. As noted above, the SJC's constitutional status guarantees its strong role in ensuring the judiciary's independence from the executive or legislative branch (see Benchmark 6.1.2). The composition and powers of the Supreme Judicial Council received a generally positive assessment from the Venice Commission (Venice Commission, 2017[39]). The Constitution and the Judicial Code provide a comprehensive basis for this body's effective functioning. The three other judicial governance bodies are established by and function based on the Judicial Code. Thus, Armenia remains compliant with the benchmark.

While all four judicial governance bodies are compliant with the benchmark, the recent resignation of the Chairperson of the Supreme Judicial Council, a lay member, allegedly at the request of the Prime Minister, has raised serious concerns about potential executive interference in judicial independence (Armenpress,

2024[40]). The monitoring team views this development as a potential sign of politicisation within the SJC and urges the country to reinforce its status as an independent constitutional body while ensuring its full autonomy. Strengthening integrity could considerably contribute to increasing independence, including through the introduction of additional mechanisms enhancing the integrity of SJC members, including lay members. This would be especially important at point of entry into the SJC and in the enforcement of these rules based on clear criteria and procedures.

Benchmark 6.3.2.

The composition of the Judicial Council and other judicial governance bodies includes not less than half of the judges who:

Element	Compliance							
	Baseline				Follow-up			
	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission
A. Are elected by their peers	✓	✓	✓	✓	✓	✓	✓	✓
B. Represent all levels of the judicial system	✓	✓	✓	✓	✓	✓	✓	✓

The Baseline Monitoring Report confirmed the compliance of all four judicial governance bodies in Armenia with elements A and B**.** Compliance is reflected in the fact that at least half of their members are elected by judges**,** and the members represent all levels of the judicial system. As of 31 December 2024, the composition of these bodies is complete and in compliance with the applicable legislation.

Supreme Judicial Council: The SJC comprises 10 members, ensuring balanced representation. Five judicial members are elected by the General Assembly of Judges for five years from among those with at least 10 years of judicial experience. Judicial members of the SJC are drawn from all court instances and specialisations, ensuring comprehensive specialisation. The composition includes one member from the Court of Cassation, one from the court of appeal, and three from the courts of first instance. At least one member must be from the courts of first instance of general jurisdiction in the marzes (regions).

Ethics and Disciplinary Commission: This commission comprises eight members, including six judicial members elected by the General Assembly of Judges by secret ballot for four years. Two of the six judicial members are selected from specialised courts, two from first instance courts (criminal and civil specialisation), one from the appeal court, and one from the Court of Cassation.

Training Commission: The commission has seven members, five of whom are judicial members elected and two of whom are non-judicial members elected by the General Assembly of Judges for four years. One of the five judicial members is selected from the Court of Cassation, Anti-Corruption and Administrative Courts of Appeal, and two from the courts of first instance.

Commission for Performance Evaluation of Judges: This commission has five members, three of whom are judicial members, and two legal scholars elected by the General Assembly of Judges by secret ballot for four years. The three judicial members include one from the Court of Cassation, one from the appeal court, and one from the courts of first instance.

Benchmark 6.3.3.

Element	Compliance							
	Baseline				Follow-up			
	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission
The composition of the Judicial Council and other judicial governance bodies includes at least 1/3 of non-judicial members with voting rights who represent the civil society or other non-governmental stakeholders (for example, academia, law professors, attorneys, human rights defenders, NGO representatives)	✓	X	X	✓	✓	X	X	✓

During the baseline assessment period, only two of Armenia's four judicial governance bodies – the Supreme Judicial Council and Performance Evaluation Commission – met the requirement of having at least one-third of their members non-judicial (elements A-B).

Supreme Judicial Council: As noted above, the SJC consists of 10 members, with five non-judicial members elected by the National Assembly with a minimum of three-fifths majority votes. Non-judicial members must be academic lawyers or prominent legal professionals with Armenian citizenship, strong professional qualities, and at least 15 years of relevant professional experience. However, as of December 2024, the Supreme Judicial Council had only seven positions filled: four judges representing various levels of the judiciary and three legal scholars. On 7 May 2025, three vacant positions reserved for legal scholars were filled.

Commission for Performance Evaluation of Judges: This commission has five members, two of whom are academic scholars with high professional qualifications, an academic law degree, and a minimum of five years of relevant work experience. Authorities reported that in 2024, the Ministry of Justice and the Supreme Judicial Council collaborated to draft a legislative package proposing amendments to the Judicial Code. The proposed changes include increasing the number of Commission members and significantly raising the proportion of non-judicial members.

Ethics and Disciplinary Commission: This commission has eight members, only two of whom are non-judicial members from civil society and elected by the General Assembly for a four-year term by a majority open vote. The eligibility requirements include high professional qualifications, a law degree or at least five years of relevant work experience. In the follow-up assessment period, the authorities initiated a legal draft to increase the number of members of the Ethics and Disciplinary Commission to 11 of which five should be lay members. However, as of December 2024, legislative changes were introduced to the respective legislation. Similarly, only two of the seven members of the Training Commission are non-judicial, falling short of the one-third requirement.

Benchmark 6.3.4.

Decisions of the Judicial Council and other judicial governance bodies:

Element	Compliance							
	Baseline				Follow-up			
	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission	Supreme Judicial Council	Ethics & Disciplinary Commission	Training Commission	Performance Evaluation Commission
A. Are published online	✓	✓	X	X	✓	✓	X	X
B. Include an explanation of the reasons for taking a specific decision	X	✓	X	X	X	✓	X	X

During the baseline assessment period, two of Armenia's four judicial governance bodies – the Training Commission and Commission for Performance Evaluation of Judges – were found non-compliant with element A due to a failure to publish their decisions online. In the follow-up assessment period, these commissions continued to publish only statistical data on their activities without making decisions publicly available.

By contrast, the SJC maintained compliance during 2023-2024 as its decisions are accessible online. Concerning the Ethics and Disciplinary Commission, according to the Judicial Code, it does not issue final decisions on disciplinary liability but submits its recommendations to the SJC. Since the SJC makes the final decision on disciplinary violations published online along with the Ethics and Disciplinary Commission's conclusions, the monitoring team considers Armenia compliant with the publication-related requirements. Since 2024, in addition to a brief overview of statistical data concerning its annual work (e.g. number of received reports, initiated and terminated cases, etc.), the Commission has also started publishing short descriptions of disciplinary proceedings initiated and then dismissed. Non-governmental organisations highlighted significant concerns about transparency in disciplinary proceedings against judges at the initial stage. They noted that most applications sent to the Ethics and Disciplinary Commission are dismissed: in 2024, 89% of reports received by the Commission were not upheld. These decisions on not initiating proceedings are neither published nor provided upon request.

Regarding providing explanations for their decisions (element B), the Baseline Monitoring Report concluded that only two judicial governance bodies – the Supreme Judicial Council (SJC) and Training Commission – failed to include such explanations. Based on information provided during the follow-up assessment, four judicial governance bodies' compliance with element B remains unchanged, with no legislative changes in respective publication requirements. Specifically, the Supreme Judicial Council's decisions, such as judicial nominations, continue to lack detailed explanations or justifications, only referencing relevant legal acts and a final decision (see also Benchmarks 6.4.1-6.4.2). The Ethics and Disciplinary Commission's recommendations to the SJC, with detailed explanations based on disciplinary complaints, continue to provide clear reasoning for the SJC's conclusions. On the other hand, some decisions of the Training Commission, among them the qualification examination of judicial candidates, do not provide explanations either. The decisions of the Commission of Performance Evaluation of Judges included some limited explanations. The authorities note that restrictions related to publishing individual

decisions stem from the requirements of the Judicial Code and the Supreme Judicial Council's Decision No. BDKH-81-N-32 of 2024.

Indicator 6.4. Judges are held accountable through impartial decision-making procedures

The Ethics and Disciplinary Commission, the Ministry of Justice, and the Corruption Prevention Commission investigate alleged judicial misconduct. The Supreme Judicial Council decides on the application of disciplinary sanctions.

In the follow-up reporting period, significant steps were made in 2023 to introduce the appeal mechanism although implementation of legislative changes has been delayed. Information received during the monitoring underlines an urgent need to explicitly define, to the extent possible, grounds for the disciplinary liability of judges, particularly those that could in any way limit the freedom of expression of judges. Additionally, authorities should ensure that sanctions are applied proportionally, with the termination of powers reserved as a last resort. Despite the absence of criminal or administrative prosecutions, several judges have been dismissed following disciplinary proceedings based on the content of their judicial decisions, which raises some concerns, particularly given the challenges related to lack of clarity on the grounds for disciplinary liability.

Benchmark 6.4.1.

The law stipulates:

Element	Compliance	
	Baseline	Follow-up
A. Clear grounds for the disciplinary liability of judges that do not include such grounds as “breach of oath”, “improper performance of duties”, or “the loss of confidence or trust” unless the legislation breaks them down into more specific grounds	X	X
B. All main steps of the procedure for the disciplinary liability of judges	✓	✓

According to the Judicial Code of Armenia, the Ethics and Disciplinary Commission, Ministry of Justice, and Corruption Prevention Commission may initiate disciplinary proceedings against a judge. The Supreme Judicial Council is the authorised body that determines cases on merits and decides on disciplinary liability. In 2022, the Baseline Monitoring Report concluded that Armenia was not compliant with element A as the legislation did not provide clear grounds for judges' disciplinary liability.

In the follow-up assessment period, Article 142 of the Judicial Code establishing grounds for disciplinary liability remained unchanged. The first basis concerns violations of substantive or procedural law provisions in the process of adjudication, provided the violation was deliberate or due to gross negligence (which could, in some cases lead to a criminal offence: Article 482 of the Criminal Code on the delivery of unjust judgments or other judicial acts motivated by personal gain). The second basis includes “gross violations of the rules of judicial conduct” provided by Article 69 of the Judicial Code, including actions that “discredit the judiciary” or “erode public confidence in its independence and impartiality”. While no legislative changes were introduced to specify these provisions, the challenge is further compounded by the continued and active use of these overly broad disciplinary grounds, including in cases where judges

were dismissed. Between 2023 and 2024, the Supreme Judicial Council reviewed 47 disciplinary cases, with 10 resulting in the termination of judicial powers (see Table 6.2). Stakeholders have cited examples of disciplinary proceedings where, in their view, the grounds for such actions were interpreted overly broadly, resulting in arbitrary application to individual cases, disproportionate sanctions, and inconsistencies in the case law of the SJC. In one notable case, a judge's tenure was terminated due to alleged delays in publishing decisions – a violation deemed a grave disciplinary offence – despite systemic issues such as excessive workload and backlogs, widely acknowledged by judges, judiciary representatives, and civil society as pervasive problems in Armenia. The monitoring team also expressed concerns over disciplinary cases where judges were dismissed following statements on critical issues within the judiciary, including in relation to ongoing disciplinary proceedings concerning other judges. Such actions were deemed in violation of the Judicial Code (Article 69, Part 1 (7), which requires judges to "refrain from publicly expressing an opinion on a case being heard or expected in any court"). The monitoring team reiterates that the legal grounds in question give the SJC and initiating bodies significant discretion, increasing the risk of arbitrary disciplinary measures and undermining judicial independence and public confidence in the judiciary. The monitoring team recommends that the law explicitly define and specify, to the extent possible, grounds for the disciplinary liability of judges, particularly those that could in any way limit the freedom of expression of judges. Additionally, sanctions should be applied proportionally, with the termination of powers reserved as a last resort.

The Judicial Code regulates key steps of disciplinary proceedings against judges as required by element B of the benchmark, and thus, the country remains compliant.

Table 6.2. Disciplinary proceedings and sanctions imposed against judges

	2023	2024
Number of disciplinary cases reviewed	15	16
Number of disciplinary cases dismissed	5	5
Number of disciplinary cases upheld by type of sanction:		
- Warning	2	2
- Reprimand / severe reprimand	5	9
- Termination	7	3

Source: Armenian authorities.

Benchmark 6.4.2.

Element	Compliance	
	Baseline	Follow-up
The disciplinary investigation of allegations against judges is separated from the decision-making in such cases	✓	✓

According to the Baseline Monitoring Report, the disciplinary investigation against a judge is conducted by the Ethics and Disciplinary Commission, Ministry of Justice, and Corruption Prevention Commission (CPC), separate from the decision-making body – the Supreme Judicial Council. The CPC may initiate disciplinary proceedings regarding asset and interest declaration integrity violations or a negative opinion on an integrity check (Article 145, Part 1). Bodies initiating disciplinary proceedings possess extensive investigative powers, including a right to examine relevant court files, seek written explanations from a

judge, and request information from state agencies, local bodies or officials (Article 147). Following this investigation, the initiating body may decide to terminate the proceedings or refer the case to the Supreme Council of the Judiciary for a decision on its merits. Once the decision to submit a petition to resolve the issue of disciplinary liability has been sent to the Supreme Judicial Council, none of these bodies may withdraw it. The body initiating disciplinary proceedings must notify the other initiating body, the complainant, and the judge involved within three days of deciding to initiate, suspend, resume or terminate proceedings. Thus, compliance with this benchmark has not changed since the baseline assessment period, as the framework clearly distinguishes initiating and decision-making stages and respective bodies.

Table 6.3. Initiation of disciplinary proceedings against judges by the responsible agency and reporting year

An agency responsible for initiating disciplinary proceedings	2023	2024
Ethics and Disciplinary Commission:		
- Number of received reports	288	183
- Number of decisions not to initiate disciplinary proceedings	264	163
- Number of initiated proceedings	13	9
- Number of dismissed cases	11	7
- Number of motions referred to SJC	2	2
Ministry of Justice:		
- Number of initiated proceedings	21	27
- Number of dismissed cases	7	12
- Number of motions referred to SJC	14	15
Corruption Prevention Commission:		
- Number of initiated proceedings	1	0
- Number of dismissed cases	1	0
- Number of motions referred to SJC	0	0

Source: Armenian authorities.

Benchmark 6.4.3.

Element	Compliance	
	Baseline	Follow-up
There are procedural guarantees of due process for a judge in disciplinary proceedings, namely the right to be heard and produce evidence, the right to employ a defence, the right of judicial appeal, and these guarantees are enforceable in practice.	X	X

The Judicial Code establishes several procedural safeguards for judges involved in disciplinary proceedings. During the investigative stage, a judge can submit written explanations and evidence, file motions, obtain copies of disciplinary proceeding materials from the initiating body, and exercise these rights either personally or through legal representation (Article 147(5), Judicial Code). At the stage of consideration by the SJC, the judge is entitled to review, take excerpts from, and make copies of materials that form the basis of the proceedings; raise objections; ask questions; provide explanations; file motions; present evidence and participate in its examination; and attend the SJC session either personally or through an advocate (Article 153, Judicial Code). The SJC decides on cases with a minimum of six members and a simple majority of votes. While judges are entitled to be informed and heard under the

existing legal framework, the Judicial Law had not foreseen the right to appeal against disciplinary decisions and sanctions during the baseline assessment period. Appeal was allowed only in exceptional cases where essential evidence or new circumstances emerged and thus, Armenia was considered non-compliant with the benchmark.

In 2023, authorities introduced significant amendments to the Judicial Law, enhancing the framework for handling disciplinary actions against judges. The amendments aimed at splitting the SJC into two panels: one four-member panel should be established for each disciplinary proceeding, which includes two members of the SJC elected by the General Assembly of Judges and two lay members elected by the National Assembly. Members are selected through a lottery system, following procedures established by the SJC. Additionally, the amendment abolishes the previous legal requirement to appeal solely based on new circumstances or evidence. Appeals should now be reviewed by the second panel (second instance panel) of the Supreme Judicial Council, composed of the remaining SJC members (who have not been involved in the initial examination of the case). The monitoring team welcomes these steps, and the new mechanism is considered an acceptable compromise solution by the Venice Commission (2022[41]). The monitoring team urges the judicial bodies of Armenia to thoroughly monitor how the appeal process will work, keeping in mind that the same body is deciding in the first and second instance, as opposed to review by a separate appellate instance. Amendments were initially planned to take effect from November 2023 but their implementation has been delayed until the Supreme Judicial Council adopts the required sub-legislative acts. As of April 2025, disciplinary cases continue to be reviewed under the previous procedure, and thus, Armenia remains non-compliant.

Non-governmental stakeholders voiced concerns about consistently enforcing the procedural guarantees listed above throughout disciplinary proceedings. A recent ruling by the European Court of Human Rights (ECtHR) underscored these concerns, noting that the Supreme Judicial Council had failed to dispel justifiable doubts regarding the impartiality of its chair, particularly given his close ties to the Minister of Justice, who had initiated the disciplinary proceedings against a dismissed judge in question (2025[42]). The ECtHR concluded that the SJC did not function as an "impartial tribunal," thereby denying the judge sufficient procedural safeguards. Another disciplinary action was initiated against a first-instance court judge following his criticism of the SJC’s decisions, including those related to disciplinary proceedings. Citing the need to maintain public trust, the SJC conducted closed hearings, a decision that drew criticism from civil society. Based on the provided information, the judge's lawyers were prevented from attending hearings, and the judge was ultimately removed from the courtroom. Beyond the lack of transparency, stakeholders cited inadequate time for the judge to prepare a defence, restricted access to court materials, and limited media access to hearings. Subsequently, the Constitutional Court of Armenia corroborated civil society’s concerns that the judge's rights to legal representation and to be heard were unlawfully restricted, especially by the "removal from the courtroom" sanction, which prevented him from presenting his position. Despite the Constitutional Court’s ruling, the judge was not reinstated to the original position. These examples raise the broader question of the urgent need for implementation of legislative changes listed above, as well as additional safeguards against improper disciplinary practices against judges and measures to increase the integrity of the judiciary.

Benchmark 6.4.4.

Element	Compliance	
	Baseline	Follow-up
There is no criminal or administrative punishment for judicial decisions (including for wrong decisions or miscarriage of justice) or such sanctions are not used in practice.	✓	✓

As the Baseline Monitoring Report indicates, Article 482 of the Criminal Code of Armenia addresses the delivery of unlawful judgments or other judicial acts motivated by personal gain; however, no judge faced sanctions under this article in 2022.

According to the 2024 Annual Report of the Prosecutor General's Office, three criminal cases were initiated under Article 482 in 2024. One of these investigations was discontinued, and authorities confirmed that by May 2025, the remaining two cases were at the trial stage. No sanctions were imposed as of December 2024. While Armenia is compliant with the benchmark as no criminal and administrative sanctions were imposed, the monitoring team underlines that imposing liability for judicial decisions could create a chilling effect and significantly impact judicial independence. In addition, the monitoring team notes that several judges have been dismissed following disciplinary proceedings initiated based on the content of their judicial decisions. This trend also raises concerns, particularly given the challenges related to lack of clarity on grounds for disciplinary liability in the Judicial Code as well as the absence of an appeal mechanism within the current system (see Benchmarks 6.4.2 and 6.4.3).

Assessment of non-governmental stakeholders

Non-governmental organisations have raised concerns about judicial independence in Armenia, emphasising that while the secure tenure of judges is formally guaranteed by law, its practical implementation remains inconsistent. They highlighted political pressure on judges, particularly in high-profile cases involving political figures or sensitive matters, which undermines public trust and the practical security of judicial tenure. Additionally, concerns were expressed about the selection and promotion of judges, noting that the current system lacks a merit-based approach and is often influenced by political considerations. Integrity assessments for judicial candidates were also criticised for inconsistent application in practice. Non-governmental organisations have expressed concerns about political considerations influencing certain judicial appointments in Armenia, including selecting candidates affiliated with political parties. These appointments are perceived to undermine public confidence in judicial independence. Non-governmental organisations also pointed to politically motivated disciplinary proceedings against judges, where disproportionate sanctions such as termination of judicial powers raised alarms about impartiality and independence, opinions also supported by recent decisions of the ECtHR. Inconsistencies in handling such cases further eroded confidence in the judiciary's fairness. Moreover, new provisions imposing stricter limitations on judges' ability to publicly express opinions on legal and judicial matters were deemed concerning by interlocutors. These measures, coupled with the application of disciplinary liability for alleged wrongful decisions or miscarriages of justice, were viewed by non-governmental organisations as tools that could interfere with judicial independence. On a positive note, interlocutors acknowledged efforts to improve judicial training programmes focused on ethics, integrity, and impartiality. Initiatives to increase transparency in disciplinary decisions and introduce an appeal mechanism were also recognised as a step forward in promoting accountability within the judiciary.

7 Independence of public prosecution service

The Prosecution Service is a separate structure that does not formally belong to any branch of power. The procedure for the appointment of the Prosecutor General does not involve non-political bodies or expert groups, and certain grounds for dismissal are unclear. The procedures for selecting and promoting prosecutors are not fully competitive or merit based. A practice persists where prosecutors are selected or promoted through closed competition among a select group of candidates. The Prosecutor General holds certain or, sometimes, decisive influence over appointment, promotion, discipline, and dismissal of prosecutors. Armenia has introduced into practice integrity checks of prosecutors that may trigger disciplinary action. While the budget for the prosecution service is adequate and salaries are legally assured, discretionary monetary awards are granted rarely. As before, Armenia does not have prosecutorial governance bodies and is not considering any reform that would establish them.

Figure 7.1. Performance level for independence of the Public Prosecution Service is average

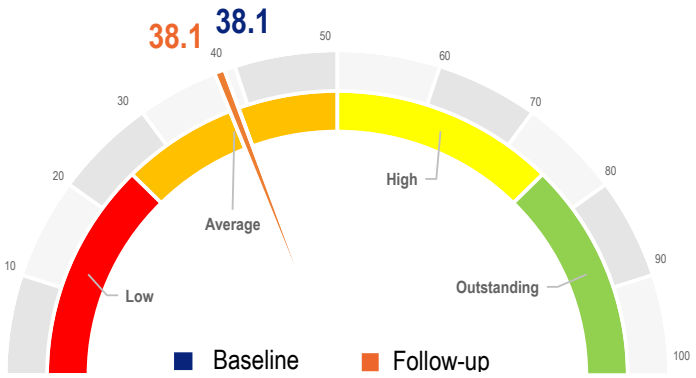
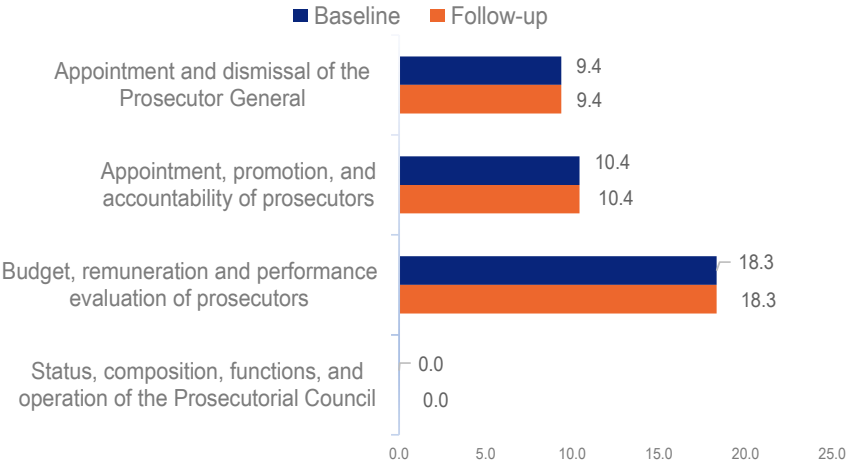


Figure 7.2. Performance level for independence of the Public Prosecution Service by indicators



Indicator 7.1. Prosecutor General is appointed and dismissed transparently and on objective grounds

The procedure for the election of the Prosecutor General has not changed since the baseline evaluation. As before, there is no involvement of prosecutorial governance or non-political expert bodies in the election procedure envisaged by the legislation. The only amendment regarding grounds for dismissal of the Prosecutor General is the specification that the termination of a criminal case against the Prosecutor General would serve as a basis for early dismissal from office only if the case is terminated on non-acquittal grounds. There were no instances of the election or dismissal of the Prosecutor General during the reporting period.

Benchmark 7.1.1.

A prosecutorial governance body or a committee, which is composed of non-political experts (e.g., civil society, academia, law professors, attorneys, and human rights defenders) who are not public officials and are not subordinated to any public authorities, reviews the professional qualities and integrity of all candidates for the Prosecutor General and provides its assessment with the appointing body:

Element	Compliance	
	Baseline	Follow-up
A. The procedure is set in the legislation	X	X
B. The procedure was applied in practice	X	X

The incumbent Prosecutor General was elected in 2022, and the regulations, along with the practical application of the existing system, were assessed in the Baseline Monitoring Report. It found that neither in the legislation nor in practice is a prosecutorial governance body or a non-political committee involved in the selection and election of the Prosecutor General. Background integrity checks performed by the Corruption Prevention Commission were found commendable but did not influence compliance with element A. Since the baseline assessment, no legislative amendments have been introduced nor changes made in practice to improve the procedure. Due to no changes either in the legislation or in practice, that assessment remains unchanged in the follow-up assessment period. Thus, Armenia is not compliant with the benchmark.

Benchmark 7.1.2.

The procedure for pre-term dismissal of the Prosecutor General is clear, transparent, and objective:

Element	Compliance	
	Baseline	Follow-up
A. Grounds for dismissal are defined in the law	✓	✓
B. Grounds for dismissal are clear and do not include such grounds as “breach of oath”, “improper performance of duties”, or “the loss of confidence or trust” unless the legislation breaks them down into more specific grounds	X	X
C. The law regulates the main steps of the procedure	✓	✓
D. The law requires information about the outcomes of different steps (if there are several steps) of the procedure to be published online	✓	✓

The Baseline Monitoring Report concluded that grounds for dismissal or termination of office of the Prosecutor General, as well as the main steps of the dismissal procedure, were set in the law, and that a sufficient level of transparency of the dismissal process was ensured. At the same time, the report found several dismissal grounds problematic, namely "committing a violation of the law or the rules of conduct of prosecutors, which has impaired the reputation of the Prosecutor’s Office” as insufficiently clear and “other insurmountable obstacles to the exercise of his or her powers” as ambiguous and very broad. Therefore, Armenia was not compliant with element B of the benchmark.

In 2023, amendments to the Law on the Prosecutor's Office specified that the termination of a criminal case against the Prosecutor General would serve as a basis for early dismissal from office only if the case were terminated on non-acquittal grounds. No other changes have been made with respect to the grounds or procedure for early termination of the powers of the Prosecutor General throughout the reporting period. Consequently, the baseline assessment remains unchanged in the follow-up assessment period.

With respect to the dismissal grounds found unclear by the Baseline Monitoring Report, authorities referred to the decision of the Constitutional Court SDO 734 dated 11 February 2008, which provided an interpretation of "insurmountable obstacles" in the context of a presidential election campaign. The ruling indicates that such a case implies a condition depriving the presidential candidate of the opportunity to participate in the election process.

The monitoring team acknowledges this interpretation, which, however, was issued by the Constitutional Court of Armenia in a specific context not related to the dismissal of the Prosecutor General and may not necessarily apply in the same manner as for the election process. Moreover, the legislative provision in question was assessed by the baseline evaluation report, and the monitoring team is not in a position to alter that assessment in the absence of any legislative changes or new documents that would suggest an interpretation or specification of the mentioned basis for dismissal of the Prosecutor General.

Benchmark 7.1.3.

Element	Compliance	
	Baseline	Follow-up
There were no cases of dismissal of the Prosecutor General outside the procedure described in benchmark 1.2	N/A	N/A

As during the baseline assessment, there were no cases of the Prosecutor General's dismissal in the follow-up period of 2023-2024. Therefore, the benchmark is not applicable.

Indicator 7.2. Appointment, promotion, and accountability of prosecutors are based on fair and clear mechanisms

In 2023-2024, Armenian regulations regarding the appointment, promotion, and accountability of prosecutors changed slightly, and some new practices were introduced. With respect to the appointment procedure, specifications were added to clarify the requirements for applicants seeking prosecutorial positions. However, this has not resulted in any improvements that would impact follow-up assessment. The ongoing practice of appointing prosecutors through a closed competition, along with the complete discretion of the Prosecutor General to make the final decision on the list of candidates selected for prosecutor positions, identified as primary deficiencies in the recruitment system within the Prosecution Service by the baseline evaluation, remains unchanged in the follow-up assessment period. Moreover, a new classification of prosecutorial positions was introduced, and the promotion procedure for lower-level prosecutors was simplified by removing the Qualification Commission from the process and granting more discretion to the Prosecutor General. None of these modifications has made the promotion process more competitive or merit-based. A new mechanism for integrity checks of prosecutors was established. The checks are conducted by the Corruption Prevention Commission, and if they result in a negative conclusion, they trigger a disciplinary investigation. However, this development has not resolved the issue of ambiguity regarding certain grounds for the disciplinary liability of prosecutors. The Prosecutor's Office has been working on a regulation that aims to clarify these problems, but this document is still in progress.

Lastly, the Prosecutor General has also been empowered to pardon prosecutors from disciplinary liability if certain conditions are met.

Benchmark 7.2.1.

All prosecutors (except for Deputies Prosecutor General) are selected based on competitive procedures and according to merit:

Element	Compliance	
	Baseline	Follow-up
A. All vacancies are advertised online	X	X
B. Any eligible candidate can apply	X	X
C. Prosecutors are selected according to merit (experience, skills, integrity)	X	X

The Baseline Monitoring Report found that the list of candidates for prosecutors in Armenia is completed through open and closed competitions. The report concluded the country was not compliant with elements A and B of the benchmark due to closed competitions for some prosecutorial positions. Vacancies were not published online, and candidates were informed about the competition in writing and through oral invitations. Authorities explained that closed competitions were used to quickly fill vacancies that require specific professional knowledge and work experience. The country was also not compliant with element C of the benchmark as final decision-making on the selection of prosecutors recommended by the Qualification Commission of the Prosecutor General's Office was at the complete discretion of the Prosecutor General rather than based on clear criteria of merit and integrity.

Since the baseline assessment, some legislative amendments have been introduced to the Law on the Prosecutor's Office with respect to recruitment in the prosecution service. In particular, the Law was supplemented by Article 33.1, specifying requirements for applicants in order to be included on the list of candidates for appointment as a prosecutor. The new article reiterates the general requirements for prosecutorial positions and contains the requirement of two years of professional experience for those seeking roles related to the confiscation of illicit assets previously stipulated by Article 33. The amendments have also lowered the age limit for applicants to 63 years, whereas the general age limit for holding prosecutorial positions remains at 65 years. Authorities clarified that these amendments were intended to specify requirements for applicants seeking prosecutorial positions.

In terms of practical application, throughout the period of 2023 and the first half of 2024, the Armenian Prosecutor's Office organised six open competitions, four of which were for the selection of prosecutors to work on handling the confiscation of illegally acquired property. These procedures resulted in the selection of 23 candidates for appointment, including five candidates for roles dealing with the confiscation of illegally acquired property. In parallel, closed competitions were also in active use. In 2023, the Qualification Commission organised 12 such competitions, resulting in the selection of nine candidates for appointment. During the first half of 2024, one closed competition took place in which 13 candidates were selected for appointment and one candidate for promotion. CSOs were permitted to attend the meetings of the Qualification Commission to observe the selection process.

Application deadlines for positions in the Department of Confiscation of Property of Illicit Origin are typically shorter than for other parts of the Prosecutor General's Office. The authorities explained this by citing the relatively heavier workload and complexity of the Department's cases as well as staff shortages, which necessitate hiring personnel as soon as possible. While these reasons are understandable, such practices

may negatively impact the quality and attractiveness of the competition. Therefore, authorities are advised to consider more thorough planning of the recruitment process to ensure that all eligible candidates have sufficient time to apply. The mentioned legislative changes have not resulted in any improvements that would affect the follow-up assessment. The continued practice of appointing prosecutors through closed competition as well as the complete discretion of the Prosecutor General in making the final decision on the list of candidates selected for prosecutorial positions, which were identified as the primary deficiencies in the recruitment system within the Prosecution Service by the baseline report, remain in place.

Armenia demonstrated several positive examples of the Prosecutor General's decisions to reject candidates proposed by the Qualification Commission based on integrity concerns. In this context, the monitoring team reiterates the recommendation of the Baseline Monitoring Report to institutionalise this practice and include it in the regulations as part of the clear criteria for confirming or rejecting nominations. Armenia is not compliant with any element of the benchmark.

Benchmark 7.2.2.

All prosecutors (except for Deputies Prosecutor General) are promoted based on competitive procedures and according to merit:

Element	Compliance	
	Baseline	Follow-up
A. Vacancies are advertised to all eligible candidates	X	X
B. Any eligible candidate can apply	X	X
C. Prosecutors are promoted according to merit (experience, skills, integrity)	X	X

According to the Baseline Monitoring Report, Armenia was not compliant with the entire benchmark. With respect to element A, the report found that vacancies for promotion were not announced to all eligible candidates but filled based on promotion lists compiled by the Qualification Commission of the Prosecutor's Office. Regarding element B, the promotion was not assessed as competitive as there was no possibility of applying for a vacancy. Contrary to element C, the law did not condition the promotion of prosecutors on compliance with certain criteria and did not define the grounds on which the Qualification Commission might give a positive or negative opinion to a prosecutor eligible for promotion. There was the same lack of objective and merit-based criteria for the Prosecutor General's selection of candidates listed in the promotion list.

The 2023 legislative amendments introduced a more granular classification of positions in the Prosecutor's Office, featuring eight levels in the hierarchy of positions instead of the previous six. Authorities informed the monitoring team that due to the new classification, corresponding changes were made to the career advancement system for prosecutors. These revisions, however, maintained most elements of the existing system for promoting prosecutors, which were deemed non-competitive by the baseline evaluation. Promotion of prosecutors, as before, is conducted through promotion lists for appointment to certain levels of the prosecutorial office, compiled by the Qualification Commission and approved by the Prosecutor General. A prosecutor may be included on the promotion lists as a result of regular competency evaluations, on an extraordinary basis or when the Qualification Commission decides to propose the experienced applicant on both lists simultaneously for appointment and promotion. At the same time, the amendments have removed the Qualification Commission from decision-making on including prosecutors in the lists for promotion at lower levels or for non-managerial positions within the prosecutorial hierarchy (for example, from a non-senior prosecutor at the district level to a non-managerial position at the regional

or Prosecutor General's Office levels) or on an extraordinary basis. The authority to make this decision now rests exclusively with the Prosecutor General based on a reasoned report by the immediate superior of the concerned prosecutor, with no verification by the Qualification Commission. This can be considered a step backwards.

Prosecutors may be included on the promotion list on an extraordinary basis only following advisory conclusions of the integrity checks conducted by the Corruption Prevention Commission (CPC), which is commendable. In practice, however, prosecutors who received a negative conclusion were still included on the list by the Prosecutor General (5 cases out of 10 negative opinions in 2023; 2 cases out of 5 negative opinions in 2025). The monitoring team was provided with several examples of such cases, such as when the disciplinary investigation initiated by the Prosecutor General after a negative CPC conclusion did not confirm concerns raised by the CPC. The 2023 amendments also expanded the scope of applicants for prosecutorial positions with prior work experience in the Prosecutor General's Office who can be included in the promotion list by the Qualification Commission. Although the modifications introduce flexibility in promoting prosecutors and, in certain instances, provide the Prosecutor General with enhanced discretion, they do not render the promotion of prosecutors more competitive or meritorious. Therefore, Armenia is not compliant with this benchmark.

Benchmark 7.2.3.

Clear grounds and procedures for disciplinary liability and dismissal of prosecutors are stipulated:

Element	Compliance	
	Baseline	Follow-up
A. The law stipulates grounds for disciplinary liability and dismissal of prosecutors	✓	✓
B. Grounds for the disciplinary liability and dismissal are clear and do not include such grounds as "breach of oath", "improper performance of duties", or "the loss of confidence or trust" unless the legislation breaks them down into more specific grounds	X	X
C. The law regulates the main steps of the disciplinary procedure	✓	✓

The Baseline Monitoring Report found Armenia compliant with elements A and C of the benchmark as grounds for disciplinary liability and dismissal of prosecutors as well as main steps of the disciplinary procedure were stipulated in the Law on the Prosecutor's Office. The grounds for dismissal raised no concerns. However, the report deemed some grounds for disciplinary liability ambiguous, namely failure to perform or improper performance of duties as well as violation of the rules of conduct for a prosecutor. No further official clarification of these grounds appeared in any official documents, leaving the country non-compliant with element B of the benchmark. A new draft procedure, aiming to clarify and specify which violations, based on their nature and severity, could serve as grounds for initiating disciplinary proceedings, was under preparation at the time.

Since then, grounds for disciplinary liability have been supplemented by a new one: prosecutor's behaviour or discrepancies in his/her financial status (having assets of unexplained origin) for which a disciplinary investigation is triggered by a negative advisory opinion of the Corruption Prevention Commission. This is directly linked to Law HO-163-N, adopted on 11 April 2024, which establishes a new mechanism for conducting regular integrity checks on all prosecutors. This legislation mandates that each incumbent prosecutor (except the Prosecutor General and his/her Deputies) undergo a one-time integrity verification, including an assessment of his/her assets. Verification is also applied to all newly appointed prosecutors

and those promoted to a higher position. In 2024, the CPC concluded 57 integrity checks of prosecutors and plans to perform 18 checks in 2025. The procedure began with local prosecutors' offices, moving upwards through the structure of the Prosecutor's Office: prosecutors of the Prosecutor General's Office will be the last to undergo checks. In some cases, negative conclusions in CPC opinions were not confirmed by disciplinary investigations. However, this new mechanism still does not clarify the grounds for disciplinary liability of prosecutors. Armenian authorities informed the team about a new order of the Prosecutor General being drafted that provides some clarification of the grounds for the disciplinary liability of prosecutors. However, it does not impact the assessment since the document has not yet been finalised and enacted. Authorities are urged to elaborate further on the mentioned clarifications, particularly concerning violation of the rules of conduct as a basis for disciplinary action.

The amendments made in 2023 also stipulate that a prosecutor who commits a disciplinary violation may avoid punishment at the discretion of the Prosecutor General. This leniency applies only if it is the prosecutor's first violation, she/he has expressed genuine remorse, and there are no repercussions resulting from the violation. Importantly, all three of these conditions must be met cumulatively. The authorities further clarified that showing remorse requires prosecutors to admit wrongdoing and assure that such a violation will not happen again. That said, this interpretation is not backed by formal regulations or guidelines, which introduces another element of ambiguity to the disciplinary process. During the reporting period, the Prosecutor General applied this pardoning mechanism once.

The follow-up assessment remains the same as at the baseline stage. Armenia complies with elements A and C but not element B of the benchmark.

Benchmark 7.2.4.

Element	Compliance	
	Baseline	Follow-up
The disciplinary investigation of allegations against prosecutors is separated from the decision-making in such cases.	✓	✓

According to the Baseline Monitoring Report, disciplinary investigations within the Prosecutor's Office are conducted by an ad hoc disciplinary commission established by the Prosecutor General to examine allegations. Upon completion of the disciplinary investigation, the case is presented to the Ethics Commission, which determines the disciplinary violation, the prosecutor's culpability, and the appropriate disciplinary sanction. The Prosecutor General then enacts the disciplinary sanction recommended by the Ethics Commission.

Concerning the new basis for disciplinary liability of prosecutors (prosecutor's behaviour or discrepancies in his/her financial status), once there is a negative assessment from the Corruption Prevention Commission following an integrity verification, the Prosecutor General is required to initiate disciplinary proceedings within one year of receiving the relevant opinion, which is much longer compared to other disciplinary violations. There is, however, allegedly a practice in place of commencing disciplinary proceedings upon receiving the Corruption Prevention Commission report. On this basis, the disciplinary sanction cannot be imposed later than six years after the respective disciplinary violation. The remaining aspects of the disciplinary procedure are the same as at the time of the baseline evaluation.

In the follow-up assessment period, the monitoring team received an example of a summary of a disciplinary investigation that did not uphold the findings of the CPC's negative conclusion regarding a prosecutor. In its concluding section, the document seeks the advice of the Prosecutor General. This indicates her/his direct oversight of the disciplinary investigation rather than handing the case over to the

Ethics Commission as the procedure described above requires. Authorities explained that the document reflects the usual procedure, which is that the Prosecutor General decides on whether to present the case to the Ethics Commission upon completion of the disciplinary investigation.

From a formal perspective, the functions of conducting an official investigation of a prosecutor, reviewing the investigation results, and making a decision appear separate. Therefore, Armenia formally complies with the benchmark. But it should be noted that, in practice, the Prosecutor General wields significant influence over key decisions both during the disciplinary investigation (e.g. determining the investigative body, commissioning the investigation, deciding on the submission of the disciplinary case to the Ethics Commission) and at the final decision-making stage regarding the outcome of disciplinary proceedings. The team also notes that the Ethics Commission itself is composed of members appointed by the Prosecutor General and chaired by his/her Deputy.

The idea behind this benchmark is to establish a system of checks and balances to ensure a fair and impartial process. A process in which all participants are, in fact, dependent on the final decision-maker is unlikely to be sufficiently fair and impartial. In this regard, the monitoring team recommends that a mechanism be established to ensure that the function of disciplinary investigation is clearly separated from decision-making in disciplinary proceedings and not substantially dependent on the Prosecutor General.

Indicator 7.3. The budget of the public prosecution service, remuneration and performance evaluation of prosecutors guarantee their autonomy and independence

In 2023-2024, the prosecution service received 94% and 92.5% in budgetary allocations of the amount it requested. Representatives of the Prosecutor General's Office participated in discussions leading to the approval of the 2023 and 2024 budgets. In 2023, an additional allowance of 92% of the official salary was introduced to be paid to all prosecutors as officials performing a role that is especially risky, complex and requiring specialisation. As an incentive, it is a discretionary monetary award that has remained in place though it is paid only in exceptional cases.

The competence evaluation of prosecutors was conducted by the Qualification Commission appointed by the Prosecutor General, with a Deputy Prosecutor General chairing the Commission. The timeframe following the regular evaluation or appointment to a new position during which the extraordinary evaluation (initiated by the prosecutor concerned or the Prosecutor General) may take place was reduced from one year to six months.

Benchmark 7.3.1.

The budgetary funding allocated to the prosecution service:

Element	Compliance	
	Baseline	Follow-up
A. Was not less than 90% of the amount requested by the prosecution service, or, if less than 90%, is considered sufficient by the prosecution service	✓	✓
B. Included participation of representatives of the prosecution service in consideration of its budget in the parliament or the parliament's committee responsible for the budget, if requested by the prosecution service	✓	✓

The Baseline Monitoring Report found that the Armenian prosecution service actually received more budget funding than requested and its representative participated in the discussions and approval of the 2022 budget.

According to information provided by the Armenian authorities in the follow-up assessment, the Prosecutor's Office requested AMD 8 097 442 from the state budget for 2023 but received less funding than requested (AMD 7 622 979), which is around 94% of the requested amount. A similar situation was repeated in 2024. The Prosecutor's Office requested AMD 10 861 985 from the state budget for 2024 but received less funding than requested (AMD 10 053 840), which is around 92,5% of the requested amount. Given that the lowest threshold required by element A of the benchmark is 90% of the requested amount, Armenia is compliant with this element. According to the Armenian authorities, the General Secretary of the Prosecutor General's Office participated in discussions on drafts of the 2023 and 2024 budgets by the competent committees of Parliament, which were supported by respective agendas.

Benchmark 7.3.2.

The law protects the level of remuneration of prosecutors and limits discretion:

Element	Compliance	
	Baseline	Follow-up
A. The law stipulates guarantees protecting the level of remuneration of prosecutors (70%) OR The level of remuneration is stipulated in the law (100%)	100%	100%
B. If there are additional discretionary payments, they are assigned based on clear criteria	X	X

According to the Baseline Monitoring Report, Armenian law defines the base salary rate and increments paid to prosecutors. However, the remuneration of prosecutors included a discretionary monetary reward, which, in fact, was paid to some prosecutors as an incentive. There were, as well, bonuses distributed equally to all prosecutors, hence not considered a discretionary payment.

The legislative amendments of 2023 (Law HO-105-N on 22 March 2023) introduced an additional allowance of 92% of the official salary to be paid to prosecutors as officials performing a role of a particular

nature especially risky, complex and requiring specialisation. Authorities confirmed that this new allowance is allocated equally among all prosecutors so it is not a discretionary payment. Regardless, monetary reward as a discretionary incentive remains in effect even though these discretionary payments constitute only around 0,01% of total prosecutorial remuneration. The authorities further informed that this reward is usually given to no more than five prosecutors per year. They provided an example of a prosecutor who was rewarded 50% of his salary for a successful asset recovery case. The monitoring team's assessment remained unchanged. Thus, Armenia is compliant with element A (100%) but is not compliant with element B of the benchmark.

Benchmark 7.3.3.

Performance evaluation of prosecutors is carried out by:

Element	Compliance	
	Baseline	Follow-up
A. Prosecutorial bodies (70%)	70%	70%
B. Prosecutorial Council or another prosecutorial governance body (100%)		

The Baseline Monitoring Report found that the competency evaluation of prosecutors belongs to the functions of the Qualification Commission. It is not recognised as a prosecutorial governance body, in line with the requirements of this monitoring. Accordingly, Armenia was found to be compliant with element A of the benchmark.

Competence evaluation remained largely the same throughout 2023-2024. Inferior prosecutors are required to undergo an appraisal conducted by the Qualification Commission every three years while superior prosecutors are exempt from this obligation. An extraordinary competence evaluation of a prosecutor may be initiated by the Prosecutor General, supported by a reasoned decision or at the prosecutor's request. The timeframe following regular evaluation or assumption of a new role in which the extraordinary evaluation may take place was reduced from one year to six months. This was explained as an opportunity for prosecutors to demonstrate skills and progress achieved in earlier careers. However, this is not necessary as the procedure for lower-level prosecutors to be placed on the promotion list has been simplified. At the same time, it allows the Prosecutor General to initiate an extraordinary competence review of a prosecutor sooner.

During the follow-up assessment period, 245 prosecutors underwent regular or exceptional competency evaluation, with eight prosecutors found not meeting the professional requirements and, therefore, recommended for dismissal and 14 prosecutors demoted. Armenia remains compliant with element A of the benchmark, as before.

Indicator 7.4. The status, composition, functions, and operation of the Prosecutorial Council guarantee the independence of the public prosecution service

Two bodies in the prosecution system (Ethics Commission and Qualification Commission) did not qualify as prosecutorial governance bodies according to the definition used for monitoring. Most members of these commissions were appointed by the Prosecutor General and Deputy Prosecutors General chaired the

commissions. Therefore, Armenia was found by the Baseline Monitoring Report to be non-compliant with the benchmarks of this indicator.

The only change in the composition of the Qualification Commission since then is that the rector of the Academy of Justice has been removed as an ex-officio member. Instead, one more member from among legal scholars has been added. However, in the absence of other institutional and structural changes, Armenia still lacks prosecutorial governance bodies that would comply with the requirements of the indicator. Non-governmental stakeholders raised their concerns regarding the absence of developments on this matter.

Armenian authorities referred to Opinion No. 18 from the Consultative Council of Prosecutors of Europe (CCPE) on "Prosecutorial Councils as Key Bodies of Prosecutorial Self-Government", adopted on 20 October 2023, noting that there may be other effective means to provide for prosecutorial independence and prosecutorial self-governance than by establishing Councils of Prosecutors or other bodies dealing with it (para. 34). In the mentioned opinion, the CCPE recognised the importance and value of other bodies dealing with prosecutorial self-governance, and accordingly considered that they should be composed and function in such a way as to exclude political interference and act for reinforcing the independence and impartiality of the prosecution services. They also referred to the Venice Commission opinions, which pointed out in its Compilation of Opinions and Reports Concerning Prosecutors that the establishment of prosecutorial councils is not an obligation (Venice Commission, 2022[43]) and the existence of such a Council cannot be regarded as a uniform standard binding all European states.

Benchmark 7.4.1.

Element	Compliance	
	Baseline	Follow-up
The Prosecutorial Council and other prosecutorial governance bodies function based on the Constitution and/or law that defines their powers	X	X

The country is not compliant with the benchmark because there was no Prosecutorial Council in the follow-up assessment period.

Benchmark 7.4.2.

The majority of the Prosecutorial Council and other prosecutorial governance bodies are composed of prosecutors who:

Element	Compliance	
	Baseline	Follow-up
A. Are elected by their peers	X	X
B. Represent all levels of the public prosecution service	X	X

The country is not compliant with the benchmark because there was no Prosecutorial Council in the follow-up assessment period.

Benchmark 7.4.3.

Element	Compliance	
	Baseline	Follow-up
The composition of the Prosecutorial Council and other prosecutorial governance bodies includes at least 1/3 of non-prosecutorial members with voting rights who represent non-governmental stakeholders (e.g., civil society, academia, law professors, attorneys, human rights defenders)	X	X

The country is not compliant with the benchmark because there was no Prosecutorial Council in the follow-up assessment period.

Benchmark 7.4.4.

The decisions of the Prosecutorial Council and other prosecutorial governance bodies:

Element	Compliance	
	Baseline	Follow-up
A. Are published online	X	X
B. Include an explanation of the reasons for taking a specific decision	X	X

The country is not compliant with the benchmark because there was no Prosecutorial Council in the follow-up assessment period.

Benchmark 7.4.5.

The Prosecutorial Council or other prosecutorial governance bodies play an important role in the appointment of prosecutors:

Element	Compliance	
	Baseline	Follow-up
A. The Prosecutorial Council or another prosecutorial governance body directly appoints prosecutors. The role of the Prosecutor General (if involved at all) is limited to endorsing the Council's decision without the possibility of rejecting it (100%) OR	X	X
B. The Prosecutorial Council or another prosecutorial governance body prepares a proposal on the appointment of a prosecutor that is submitted to the Prosecutor General, which may reject it only in exceptional cases on clear grounds explained in the decision (70%) OR		
C. The Prosecutorial Council or another prosecutorial governance body reviews all candidates for the position of a prosecutor and makes a justified recommendation to the relevant decision-making body or official (50%)		

Note: The country is compliant with one of the alternative elements A-C if the respective procedure applies to all prosecutors. If different procedures apply to different categories of prosecutors, the country's score is determined by the element with the lower number of points.

The country is not compliant with the benchmark because there was no Prosecutorial Council in the follow-up assessment period.

Benchmark 7.4.6.

The Prosecutorial Council or other prosecutorial governance bodies play an important role in the discipline of prosecutors:

Element	Compliance	
	Baseline	Follow-up
A. The Prosecutorial Council or another prosecutorial governance body directly applies disciplinary measures or proposes disciplinary measures to the relevant decision-making official that can be rejected only in exceptional cases on clear grounds explained in the decision	X	X
B. If the Prosecutor General is a member of the Prosecutorial Council or other prosecutorial governance bodies dealing with disciplinary proceedings, he or she does not participate in decision-making on the discipline of individual prosecutors	X	X

The country is not compliant with the benchmark because there was no Prosecutorial Council in the follow-up assessment period.

Assessment of non-governmental stakeholders

Non-governmental stakeholders raised concerns regarding the absence of meaningful measures in the reform of the prosecution service within the Legal Reform Strategy 2022-2026 and other policy documents. They also pointed out the lack of a prosecutorial council or a similar governance body, the highly centralised structure of the prosecution service, and the insufficient internal independence of prosecutors. Additionally, they noted the politicised procedure for appointing the Prosecutor General, which allows for holding the position for two consecutive terms as well as ambiguous grounds for dismissing the Prosecutor General. Moreover, stakeholders expressed their concerns about the outdated system for the performance evaluation, with a significant role of line managers. Civil society noted a lack of clear criteria and transparency in the evaluation process, along with the exemption of high-level prosecutors from the appraisal. Some stakeholders emphasised the need for greater transparency in the selection of members of the Qualification Commission and the promotion and disciplinary liability of prosecutors: selection criteria and principles are not clear to the public. Stakeholders acknowledged the possibility of monitoring the selection process of prosecutors and the importance of integrity checks on candidates and incumbent prosecutors carried out by the Corruption Prevention Commission.

8 Specialised anti-corruption institutions

Armenia has two investigative bodies: the Investigative Committee and the Anti-Corruption Committee, the latter of which investigates corruption and related offences with the exception of certain money laundering cases. A specialised department within the Prosecutor General's Office prosecutes cases from the Anti-Corruption Committee but the selection of the department's head is neither open nor competitive. The Prosecutor General can change investigative jurisdiction in exceptional cases on legal grounds, some of which are not sufficiently clear. Armenia lacks a specialised body for asset recovery and managing assets seised or confiscated in corruption cases. The Department for Confiscation of Illicit Assets within the Prosecutor General's Office proactively targets illicit assets but its mandate is limited to civil forfeiture. The recent resignation of the Chair of the Anti-Corruption Committee raised concerns over the agency's independence. A new Chair was selected and appointed in 2025. The Anti-Corruption Committee and the Prosecutor General's Office regularly publish their anti-corruption work results.

Figure 8.1. Performance level for specialised anti-corruption institutions is high

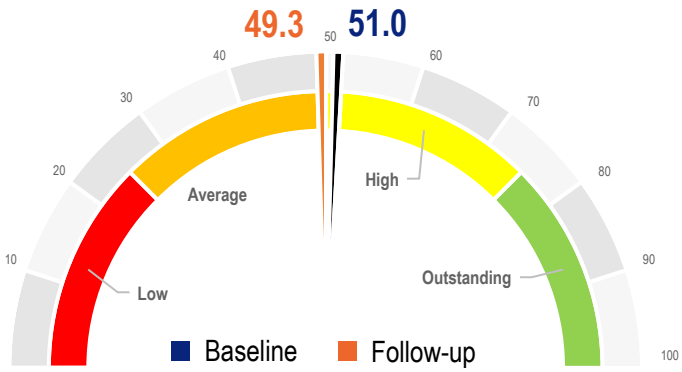
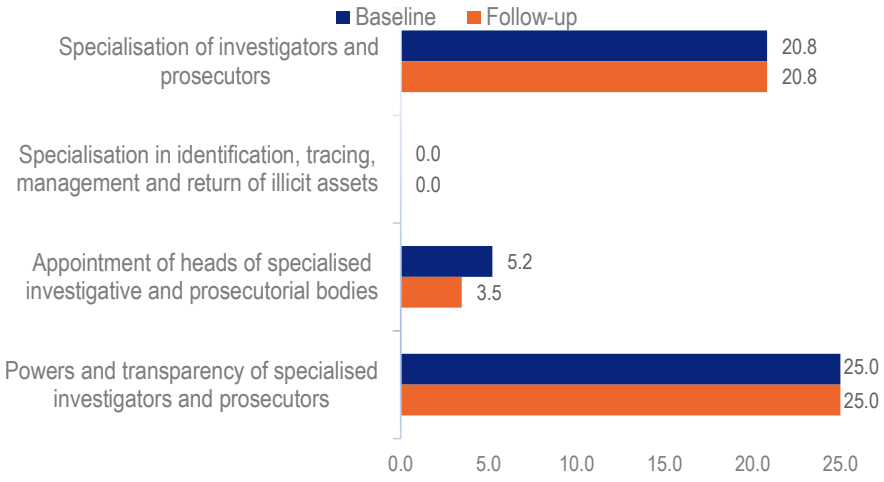


Figure 8.2. Performance level for specialised anti-corruption institutions by indicators



Indicator 8.1. The anti-corruption specialisation of investigators and prosecutors is ensured

Armenia has two investigative bodies: the Anti-Corruption Committee (ACC) and Investigative Committee. The Criminal Procedure Code defines their jurisdiction. The ACC is a specialised body that investigates corruption offences. Legislative changes adopted during the reporting period removed some possible corruption-related money laundering offences from the ACC's jurisdiction. The legislation also grants discretion to the Prosecutor General to change the jurisdiction of investigative bodies in exceptional circumstances without entirely clear grounds, which is sometimes applied to ACC cases in practice. The anti-corruption specialisation of prosecutors was maintained in the follow-up assessment period. The Department for Oversight of the Legality of Pre-Trial Proceedings within the Anti-Corruption Committee of the Prosecutor General's Office supervises and prosecutes ACC cases.

Benchmark 8.1.1.

Investigation of corruption offences is assigned in the legislation to a body, unit or group of investigators which specialise in combating corruption:

Element	Compliance	
	Baseline	Follow-up
A. There are investigators with a clearly established mandate and responsibility to investigate corruption offences as the main focus of activity (70%) OR	100%	100%
B. There is a body or unit of investigators with a clearly established mandate and responsibility to investigate corruption offences as the main focus of activity (100%)		

Note: The main focus of activity means that the specialised investigators, body, or unit predominantly and primarily deal with the investigation of corruption offences but may also investigate other related crimes, namely crimes which are close in their nature to corruption (for example, misuse of state budget) or are investigated together with corruption offence (for example, forgery in office, fraud, participation in an organised criminal group).

The Baseline Monitoring Report concluded that Armenia was compliant with element B of the benchmark since the Anti-Corruption Committee (ACC), established in 2021, was a specialised body with the authority to conduct a preliminary investigation of corruption in the public sector and related offences.

This institutional model has not changed since the previous evaluation as the ACC has continued its work on investigating corruption, the main focus of the body's activity. In 2023, the Committee investigated 1 801 criminal cases and in 2024, 2 289 cases. However, according to the transitional provisions of the Criminal Procedure Code, in 2023, the ACC was mandated to investigate only corruption in the public sector while private sector corruption fell under the jurisdiction of the Investigative Committee. Since the beginning of 2024, investigating corruption in the private sector has become part of the ACC's mandate. With these changes, the ACC has the mandate to investigate almost all corruption and related offences except for the cases specified below.

Armenian authorities further explained that corruption offences committed in profit-making state-owned enterprises (SOE) or funds are regarded as private sector corruption for which the law establishes lesser sanctions than for corruption committed by or involving public officials. This distinction accounts for one of the major ongoing corruption cases related to the work of the Armenian National Interests Fund (ANIF), which began before 2024 and is being investigated by the Investigative Committee. Such interpretation is explained by the definitions of a public official and an employee of a commercial or other organisation as outlined in the Criminal Code (Art. 3, points 20 and 21).

In this context, the monitoring team reiterates that the OECD Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises recommend taking the measures necessary to establish that applicable laws criminalising bribery of public officials apply equally to the representatives of SOE governance bodies, management and employees where these are legally considered as public officials (Recommendation A.II.4.i). The definition of foreign public officials contained in the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions encompasses any person exercising a public function for a foreign country, including for a public agency or public enterprise. The definition of public officials in the United Nations Convention Against Corruption (UNCAC) also covers any person who performs a public function, including for a public agency or public enterprise or provides a public service, as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party. Mindful of these provisions of international standards and recommendations, the monitoring team

suggests that Armenian authorities consider reviewing their rules to ensure that criminal liability for corruption is applicable equally to representatives of governance bodies, management, and employees of SOEs and similar publicly owned entities as well as to public officials.

The precise list of corruption offences that, in addition to some other offences, belong to the jurisdiction of the Anti-Corruption Committee is stipulated by Appendix 1 to the Criminal Code. Legislative amendments adopted in 2023 introduced specific conditions under which some offences would be qualified as corruption. The money laundering offence has been retained on the list only if committed using official powers or the influence derived therefrom. In addition, abuse of power committed for non-meritorious motives, involving violence, threats of violence or the use of weapons or special means, has been removed. Due to these changes, offences such as corruption-related money laundering committed by third parties (e.g. professional laundering of proceeds of corruption) that fall under the definition of corruption offences for the purposes of this monitoring no longer belong to the ACC's jurisdiction. While this does not affect the compliance rating since the ACC's mandate to investigate remaining corruption offences remains in place, Armenian authorities are recommended to revise the approach to ensure that the investigation of all corruption-related offences is encompassed by the ACC's jurisdiction. Also, offences committed by ACC employees, including corruption, fall under the jurisdiction of the Investigative Committee.

In 2023, the number of ACC staff was increased. The Committee currently has 120 positions of operative officers and 80 positions of investigators. At the time of monitoring, around 35% of operative positions and 10% of investigative positions were vacant. The monitoring team would like to draw the attention of the authorities to the importance of providing the agency with the necessary resources to enable full-capacity functioning.

In this context, non-governmental stakeholders stressed that the number of applicants seeking jobs in the ACC has been decreasing, in particular, due to increasing salaries in other law enforcement bodies (initially, ACC salaries were higher) and lack of clear professional growth prospects. They also pointed out delays with integrity checks of candidates by the Corruption Prevention Commission. Armenian authorities explained that the decrease in the number of applicants was due to high professional standards and the removal of the special pension for ACC officers after 20 years of service. The authorities are urged to analyse the ACC human resources situation and develop measures to attract talented professional staff by providing clear and transparent career advancement opportunities. Armenia is compliant with element B of the benchmark.

Benchmark 8.1.2.

The jurisdiction of the anti-corruption body, unit, or group of investigators specified in 1.1 is protected by legislation and observed in practice:

Element	Compliance	
	Baseline	Follow-up
A. The legislation does not permit corruption cases to be removed from the specialised anti-corruption body, unit, or investigator or allows it only exceptionally, based on clear grounds established in the legislation	X	X
B. There were no cases of transfer of proceedings outside legally established grounds	✓	✓

The Baseline Monitoring Report concluded that Armenia was not compliant with element A of the benchmark, as grounds for transferring criminal cases from one investigative authority to another by

decision of the Prosecutor General, as well as reallocating a case from one investigator of the ACC to another under the jurisdiction of the Head of the Department, were unclear.

According to Article 181, part 8, of the new Criminal Procedure Code of Armenia, which entered into force in 2022, in exceptional cases, the Prosecutor General is authorised, by his/her decision, to order the continuation of an investigation by an investigator from a different investigative body if such a transfer is necessary as a last resort to ensure the impartiality of the investigation. The baseline evaluation found a similar provision to the previous Criminal Procedure Code, which is open to extensive interpretation. In 2024, the mentioned article was supplemented with part 8.1, envisaging that in exceptional cases, in order to ensure the proper and comprehensive investigation of a criminal case, the Prosecutor General can also change the rules of investigative jurisdiction if the criminal case is factually related to another one.

The monitoring team was informed about several cases in which the Prosecutor General exercised her discretion by assigning cases to certain investigative bodies. One of these examples concerns a high-level corruption-related case that was initially assigned to the Investigative Department of the National Security Service because the agency detected the case and the case was connected to the information technology sector. After the department was abolished, the case was transferred to the Investigative Committee.

The new Code also kept a provision allowing for the removal of an investigator from a case in the event of a gross violation of the law during criminal proceedings. During the baseline evaluation, the monitoring team concluded that “a gross violation of the law” does not qualify as clear grounds under the definition of the Assessment Framework. Therefore, Armenia is not compliant with element A of the benchmark.

During 2023-2024, the Anti-Corruption Committee submitted to the Prosecutor General's Office 598 cases (273 private sector corruption cases in 2023 and 347 cases in 2024) that did not fall under ACC jurisdiction and were transferred for investigation to the Investigative Committee. These high numbers were explained by the provisions of the Criminal Procedure Code requiring that an investigation be started within 24 hours of receiving a report of an alleged crime. For this reason, the ACC staff must initially handle reports submitted to the agency even if they concern crimes outside its jurisdiction. Armenia is urged to streamline operational procedures and increase public awareness of the ACC mandate to prevent excessive use of its resources for processing reports on offences beyond its jurisdiction. The monitoring team has not received evidence of any transfers made outside of legally established grounds. The country is compliant with element B of the benchmark.

Benchmark 8.1.3.

Prosecution of corruption offences is conducted by a body, unit or group of prosecutors which specialise in combating corruption:

Element	Compliance	
	Baseline	Follow-up
A. There is a body, unit, or group of prosecutors with a clearly established mandate to supervise or lead the investigation of corruption cases as the main focus of activity	✓	✓
B. There is a body, unit, or group of prosecutors with a clearly established mandate to present corruption cases in court as the main focus of activity	✓	✓

Note: A similar approach to the “main focus” is used as in the note to 1.1.

As in the Baseline Monitoring Report, the prosecution of corruption cases investigated by the Anti-Corruption Committee is conducted by the specialised Department for Oversight of the Legality of Pre-Trial

Proceedings within the Anti-Corruption Committee of the Prosecutor General's Office. This Department supervises the legality of preliminary investigations carried out by the Anti-Corruption Committee and deals with prosecuting these cases in court. There are 17 positions in the department, out of which seven were vacant at the time of monitoring. The department is supported by two advisors to the Prosecutor General who have economic expertise. The monitoring team reiterates its advice regarding the resources, which is the same as for the ACC under Benchmark 8.1.1. Armenia is compliant with both elements.

Indicator 8.2. The functions of identification, tracing, management, and return of illicit assets are performed by specialised officials

Armenia does not have a specialised body or group of professionals to handle asset recovery and the management of seised and confiscated assets in corruption-related cases. The Department for Confiscation of Illicit Assets of the Prosecutor General's Office works actively to enforce legislation regarding the civil confiscation of illicit assets. However, its mandate does not encompass confiscation and asset recovery within criminal proceedings.

Benchmark 8.2.1.

Element	Compliance	
	Baseline	Follow-up
A dedicated body, unit or group of specialised officials dealing with the identification, tracing and return of criminal proceeds, including from corruption (asset recovery practitioners), functions in practice	X	X

The functions of detecting and disclosing illegal assets in criminal cases involving corruption-related crimes are assigned to the Anti-Corruption Committee. This remained the same as at the time of the baseline assessment. However, no specialisation in this field is ensured in the Committee's structure. The competence of the Department for Confiscation of Illicit Assets of the Prosecutor General's Office is restricted to the recovery of assets in civil proceedings. It should be noted, however, that the department was quite active in performing its functions during the reporting period. In 2023, it initiated 82 and in 2024, 163 inquiries into suspicious assets, which resulted in 117 lawsuits for the confiscation of property of illegal origin (73 in 2023, 44 in 2024). In 2024, the court fully satisfied the department's one claim, and four claims were partially satisfied. Nevertheless, in the absence of any institutional changes, Armenia remains non-compliant with the benchmark.

Benchmark 8.2.2.

Element	Compliance	
	Baseline	Follow-up
A dedicated body, unit or group of specialised officials dealing with the management of seised and confiscated assets in criminal cases, including corruption, functions in practice	X	X

Note: Benchmarks 2.1 and 2.2: There is no requirement that the body, unit, or a group of specialised officials deal exclusively with corruption proceeds. If they deal with different kinds of criminal assets, including corruption assets, Benchmarks 2.1 and 2.2 are met as long as the body, unit or group of specialised officials deal exclusively with the function(s) described in 2.1 and 2.2, and do not perform other duties.

In 2023-2024, as during the baseline assessment, there were no specialised practitioners or entities dealing with the management of seised and confiscated assets in criminal cases, including corruption, as required by the benchmark. Armenia is not compliant with the benchmark.

Indicator 8.3. The appointment of heads of the specialised anti-corruption investigative and prosecutorial bodies is transparent and merit-based, with their tenure in office protected by law

In 2024, the Chair of the Anti-Corruption Committee resigned simultaneously with the heads of several other agencies at the request of the Prime Minister. This method of resignation of the ACC head, even though technically compliant with the legal grounds, raised concerns among CSOs and called into question the agency's independence from the country's political leadership. Meanwhile, grounds for the dismissal of the ACC Chair remained unchanged, including those deemed ambiguous by the prior evaluation. The resignation triggered a competition for the selection of a new head of the agency for which a respective Competition Board was established. This process also attracted criticism from NGOs and the media due to concerns regarding undisclosed connections among some board members as well as the panel's professionalism and lack of clear criteria for assessing the candidates. The board ultimately selected three candidates, one of whom was appointed as the ACC Chair. However, this report does not provide a complete assessment of the selection and appointment process as it was finalised in 2025, which is beyond the assessment period. While the legislation regulates the main steps of the process for appointing the head of the Department for Oversight of the Legality of Pre-Trial Proceedings within the Anti-Corruption Committee of the Prosecutor General's Office, the procedure is neither open nor competitive. By the time of the onsite visit, the position was vacant, and the Department's previous Head, who served during 2023-2024, had been selected for the position through promotion based on a recommendation from the extraordinary competence evaluation.

Benchmark 8.3.1.

The head of the anti-corruption investigative body, unit, or group of investigators, which specialises in investigating corruption, is selected through the following selection procedure in practice:

Element	Compliance	
	Baseline	Follow-up
A. The legislation regulates the main steps in the process	N/A	N/A
B. The information about the outcomes of the main steps is published online	N/A	N/A
C. The vacancy is advertised online	N/A	N/A
D. The requirement to advertise the vacancy online is stipulated in the legislation	N/A	N/A
E. Any eligible candidates could apply	N/A	N/A
F. The selection is based on an assessment of candidates' merits (experience, skills, integrity) in legislation and in practice	N/A	N/A

Note: If the head of the specialised body, unit or group of investigators was not selected in the monitoring period, the benchmark will be considered as "not applicable". If the selection procedure was not finalised at the time of monitoring, it will be evaluated in the monitoring cycle after its completion, and the benchmark will be considered as "not applicable" until it is finalised.

The Baseline Monitoring Report did not apply the benchmark since there was no practice of selecting the ACC Chairperson in 2022, and the incumbent Chairperson at the time was appointed in 2021. As described in the Baseline Report, open and competitive selection of the Head of the Anti-Corruption Committee is regulated by the law on the ACC that defines the main steps of the process, including setting up the Competition Board, its operation, announcing an open competition for the position, assessment of candidates in several stages, proposing to the government two or three candidates for the position, and appointment by the Cabinet of Ministers. The report stressed that the final decision of the government to select one of three candidates is discretionary and can be guided by political or other considerations. This is why it is recommended to limit the board's proposal to one candidate who received the highest score and satisfied the integrity criteria.

In November 2024, the Chairperson of the Anti-Corruption Committee resigned at the request of the Prime Minister, and initial steps for selecting a new Chairperson were taken. In particular, the Competition Board was formed, comprising six members: one representative of the Prosecutor General's Office, one representative of the Ministry of Justice, one representative of the Parliament, one member of the Supreme Judicial Council, and two representatives of CSOs. The member of the Supreme Judicial Council was selected as Chairperson of the board. Some CSOs, however, pointed to a conflict of interest due to connections among three of the board members (Armenian Lawyers' Association, 2024[44]). Initially, only one person, who, at the time of application, held the position of Head of the General Department for Economic Security and Counteraction to Corruption of the National Security Service, applied for the competition announced by the government. However, the candidate did not receive enough votes to be proposed to the government for the appointment. Some CSOs, observing the candidate's interview, which took place in January 2025, questioned the board's ethics and professionalism (Protection of Rights Without Borders, 2025[45]). After that, five other candidates applied for the position and in March 2025, the Competition Board proposed three of them to the government. One of the proposed candidates, who had been the Deputy Chairperson of the Investigative Committee until then, was appointed by the government as the ACC Chairperson. A media analysis of the Competition Board's interviews with the candidates and

subsequent voting patterns pointed to possible conflicts of interest among some board members and a lack of clear assessment criteria. As well, the final decision was made in the absence of one board member representing civil society (2025[46]).

All interviews conducted during the selection process were broadcast and observed by civil society and the media. However, the mentioned facts shared by CSOs and the media regarding the work of the Competition Board raise reasonable concerns about whether the selection process was well organised and conducted fully in accordance with integrity and professional standards. In this regard, the monitoring team underscores that these conditions are critical not only for the objective and transparent selection of leadership of anti-corruption institutions but also for building trust and co-operative partnerships with civil society and investigative journalists. Nevertheless, the benchmark remains inapplicable as the selection process was completed in 2025, which is beyond the assessed timeframe.

Benchmark 8.3.2.

The procedure for pre-term dismissal of the head of the anti-corruption investigative body, unit, or group of investigators which specialise in investigating corruption is clear, transparent, and objective:

Element		Compliance	
		Baseline	Follow-up
A.	Grounds for dismissal are defined in the law	✓	✓
B.	Grounds for dismissal are clear and do not include such grounds as “breach of oath”, “improper performance of duties”, or “loss of confidence or trust” unless the legislation breaks them down into more specific grounds	X	X
C.	The law regulates the main steps of the procedure	X	X
D.	The law requires that information about the outcomes of different steps (if there are several steps) of the procedure be published online	X	X

The ACC Law (Article 24) defines the grounds for dismissal of the head of the Anti-Corruption Committee, some of which were found by the baseline evaluation to be not entirely clear. The latter, namely, concerns grounds that allow dismissing the ACC Chairperson, such as by starting any criminal investigation against him/her or through the application of a disciplinary penalty as well as one related to violating the prohibition to engage in political activities. The law does not regulate the main steps of the dismissal procedure and, therefore, does not require the publication of their outcomes. In the absence of any legislative changes regarding the dismissal of the Chairperson of the Anti-Corruption Committee, the assessment remains unchanged.

Benchmark 8.3.3.

Element	Compliance	
	Baseline	Follow-up
There were no cases of dismissal of the head of the anti-corruption investigative body, unit, or a group of investigators outside of the procedure described in benchmark 3.2	N/A	X

Note: If the head of the specialised body, unit or group of investigators was not dismissed in the monitoring period, the benchmark will be considered as "not applicable". If the dismissal procedure was not finalised at the time of the monitoring, it shall be evaluated in the monitoring cycle after its completion and the benchmark will be considered as "not applicable" until it is finalised.

At the time of the Baseline Monitoring Report, the benchmark was not applicable as there were no instances of the dismissal of the ACC Chairperson in 2022.

In November 2024, the Chairperson of the Anti-Corruption Committee resigned at the same time as a number of other officials, following criticism from the Prime Minister about the poor performance of the justice system and his request to them to step down (Reuters, 2024[47]). This approach attracted criticism from civil society as the dismissal was not transparent but guided by political considerations. While the resignation of the ACC Chairperson technically complied with legislative grounds, the monitoring team shares those concerns. The resignation is supposed to be a voluntary decision of the official concerned, and the established procedures governing the dismissal of the ACC Chairperson do not envisage such action at the request or direction of the Prime Minister. This situation suggests that the tenure of the ACC Chairperson was not respected in practice, calling into question the agency's independence from the country's political leadership. The monitoring team reiterates the importance of safeguards of the independence of specialised anti-corruption institutions, ensuring unbiased and objective investigations and prosecutions of corruption offences. One such guarantee is a clear, transparent, and objective procedure for the pre-term dismissal of their heads, in both law and practice, insulating these institutions from political or any other undue interference. The monitoring team concludes that Armenia is not compliant with the benchmark.

Benchmark 8.3.4.

The head of the anti-corruption prosecutorial body or unit is selected through the following selection procedure:

Element	Compliance	
	Baseline	Follow-up
A. The legislation regulates the main steps in the process	✓	✓
B. The information about the outcomes of the main steps is published online	X	X
C. The vacancy is advertised online	X	X
D. The requirement to advertise the vacancy online is stipulated in the legislation	X	X
E. Any eligible candidates could apply	X	X
F. The selection is based on the assessment of candidates' merits (experience, skills, integrity)	X	X

Note: If the head of the specialised body, unit or group of prosecutors was not selected in the monitoring period, the benchmark will be considered as "not applicable". If the selection procedure was not finalised at the time of monitoring, it will be evaluated in the monitoring cycle after its completion and the benchmark will be considered as "not applicable" until it is finalised.

The Baseline Monitoring Report found that Armenia did not have a special procedure for appointing the Head of the Prosecutor General's Office (PGO) Department for Supervision over Legality of Pre-Trial

Proceedings in the Anti-Corruption Committee. The only peculiarity was that before the appointment, in accordance with the procedure established by law, the individual passed an integrity check. There was a separate promotion list that included candidates for heads of PGO departments but no special procedure was provided for candidates for the PGO department dealing with corruption cases.

The situation has not changed since the baseline assessment in 2022. During the onsite visit, the position of the head of the mentioned department was vacant. The previous head, who was in office during 2023-2024, had been selected to that position through promotion based on recommendation of the extraordinary competence evaluation (see Benchmark 7.2.2). Armenia is compliant only with element A.

Indicator 8.4. The specialised anti-corruption investigative and prosecutorial bodies have adequate powers and work transparently

The Anti-Corruption Committee has the authority to conduct undercover investigative actions in accordance with the Criminal Procedure Code and to carry out operational investigative activities as per the Law on Operational Investigative Activities. The agency implements these activities in practice. The Committee has access to tax and customs databases as well as bank information through a court order. The Prosecutor General's Office and the Anti-Corruption Committee publish regular reports containing information about law enforcement efforts in the fight against corruption. PGO reports, among other things, include disaggregated data on the number of criminal investigations, cases closed, and those submitted to the court. Authorities are advised to further enhance the level of detail in their reports, and the PGO is also urged to publish data in a machine-readable format.

Benchmark 8.4.1.

An anti-corruption investigative body, unit, or group of investigators which specialises in investigating corruption has in legislation and practice:

Element	Compliance	
	Baseline	Follow-up
A. Powers to apply covert surveillance, intercept communications, and conduct undercover investigations	✓	✓
B. Powers to access tax, customs, and bank data directly or through a court decision	✓	✓

Note: Powers to apply covert surveillance, intercept communications and conduct an undercover investigation can be performed by the dedicated body, unit, or a group of investigators directly or through (with the help of) other bodies.

The Baseline Monitoring Report confirmed the authority of the ACC to perform undercover investigative actions according to the Criminal Procedure Code and carry out operational investigative activities according to the Law on Operational Investigative Activities. The report also concluded that the country was compliant with element A of the benchmark since these powers were implemented in practice. Armenia was also compliant with element B of the benchmark as the ACC had access to tax, customs and bank data through a court order.

Armenian authorities confirm that this has not changed, and the Anti-Corruption Committee has the same powers that were evaluated during the baseline assessment period. With respect to element A, the monitoring team would like to add that, according to the general rule, documents compiled as a result of operational-investigative measures and data recorded on any media are not evidence in criminal proceedings. At the same time, recordings and documents obtained with the permission of the court as a result of operational-investigative activities (internal surveillance; monitoring of correspondence and

communications; monitoring of financial transactions; imitation of a bribe, external surveillance with the use of technical means) carried out outside the framework of criminal proceedings may be recognised as extra-procedural documents and attached to the case file only if the relevant measure was taken to prevent or thwart the alleged crime or identify the person who committed the alleged crime at the time of the crime or immediately thereafter. Such materials may be used to substantiate a criminal charge.

With respect to element B, some non-governmental stakeholders underscored that law enforcement agencies are not fully equipped, neither in law nor in practice, with sufficient mechanisms to obtain access to the databases of state bodies through electronic requests, which are necessary for the prevention, effective investigation, and detection of corruption and other economic crimes. In this context, the monitoring team commends the plans of Armenian authorities to create an integrated platform for the active and secure exchange of information among intelligence units, investigative and prosecutorial bodies, and asset recovery specialists as well as to access databases from other state bodies (as envisaged by the Anti-Corruption Strategy). While this step is designed to ensure the effectiveness and efficiency of procedures for confiscating property of illicit origin, the monitoring team encourages authorities to consider expanding its purposes and applying this mechanism for the detection and investigation of corruption as well. These considerations do not prevent the monitoring team from concluding that Armenia is compliant with both elements of the benchmark.

Benchmark 8.4.2

Detailed statistics related to the work of the anti-corruption investigators and prosecutors are published online at least annually, including:

Element	Compliance	
	Baseline	Follow-up
A. A number of registered criminal proceedings/opened cases of corruption offences	✓	✓
B. A number of persons whose cases were sent to court disaggregated by level and type of officials	✓	✓
C. A number of terminated investigations with grounds for termination	✓	✓

Note: The grounds for termination means legal grounds, such as running out of the statute of limitations, absence of elements of the crime, etc. but not details of the cases.

The Baseline Monitoring Report found that the annual report published on the website of the Prosecutor General's Office contained all the information required by the benchmark.

In 2023-2024, the Anti-Corruption Committee and the Prosecutor General's Office continued the practice of publishing annual reports on the results of their work. In addition, the PGO publishes an annual report on the fight against corruption. The mentioned reports of the PGO include almost all the information, as required by the benchmark. Regarding the requirement for element B of the benchmark, the reports provide information on the number of convicted persons, categorised by level and type of officials. In contrast, for cases submitted to the court, only the number of indicted persons for each criminal offence is included. Non-governmental stakeholders expressed their concerns regarding regular ACC reports, which do not include information on the grounds for termination of criminal proceedings. They also emphasised the need for more specific sections in the reports, for example, on high-level corruption cases or those related to public procurement, detailing the results of respective investigations.

The monitoring team finds the current level of detail sufficient to conclude that the country is compliant with all elements of the benchmark but encourages the country to enhance the quality of its reports, particularly

regarding the results of high-level corruption investigations. Furthermore, the PGO is urged to enhance the format of its reports by ensuring they are machine-readable.

Assessment of non-governmental stakeholders

The monitoring team received critical messages from non-governmental stakeholders regarding the revision of the list of criminal offences, which removed potentially corruption-related crimes from the ACC's jurisdiction. Stakeholders also expressed concerns about the resignation of the former Chairperson of the Anti-Corruption Committee, which, in their opinion, serves as evidence of the agency's insufficient institutional independence from political institutions. Additionally, some stakeholders shared doubts about the composition of the Competition Board responsible for selecting the new ACC Chairperson, specifically concerning undisclosed connections among some board members as well as organisation of the board's work and a lack of clear assessment criteria.

In this context, stakeholders recommended the following:

- establish an independent anti-corruption institutional system
- fill all leadership positions within the independent anti-corruption institutional system with professional, honest, and qualified personnel exclusively through open, transparent, merit-based, and apolitical competitions and procedures
- apply unimpeded mechanisms for detecting corruption crimes and ensuring accountability, free from any political interference and selective approaches
- reduce the level of discretion of the government in selecting the ACC Chairperson from a list of shortlisted candidates to ensure merit-based appointments.

Furthermore, stakeholders recommended developing and delivering training courses for newly appointed staff, such as for investigators on how to investigate complex corruption cases and human rights legislation and practices. They also emphasised the need for training and guidelines for ACC practitioners. Some stakeholders stressed the lack of ACC’s prompt response to allegations of corruption in the media, including reports from investigative journalists. Stakeholders also pointed out issues related to the recruitment of ACC investigators and delays in integrity checks for candidates by the Corruption Prevention Commission. They highlighted legislative amendments that improved the disciplinary procedure within the ACC, introduced integrity checks for its staff (similar to those for judges and prosecutors), and established comprehensive regulations on the use of weapons by ACC officers to enhance transparency, accountability, and adherence to human rights standards. Other amendments also introduced annual reporting by the ACC before Parliament, which, in the stakeholders' opinion, promotes the agency's accountability and contributes to greater transparency in its operations. Some stakeholders also emphasised the need to enhance the level of detail in the regular reports of the ACC and the Prosecutor General's Office as well as publish the data in a machine-readable format.

The recent report, Assessment of the Activity of the Anti-Corruption Committee, which covers the period of 2021-2023, indicated the ACC’s relatively strong position in maintaining its autonomy from external influences based on the assessment of legal regulations. At the same time, the report found the level ofadequacy regarding funding and staffing of the agency moderate. It also highlighted the need for enhanced transparency and oversight mechanisms in relation to its activities (Transparency International Armenia, 2025[48]). However, stakeholders raised concerns about more recent challenges regarding the agency's institutional independence in practice. With respect to the specialisation of staff on asset management, stakeholders stressed the lack of proper frameworks for the effective management and oversight of administration of confiscated assets as well as overall insufficient transparency and accountability of the asset recovery process.

9 Enforcement of corruption offences

A new Criminal Code has introduced important changes, including new rules on the statute of limitations and the liability of legal persons. Armenia demonstrated a growing number of convictions for active and passive bribery in the public sector but convictions for trading in influence and private sector bribery were rare. A new civil forfeiture mechanism is proactively applied for non-conviction-based confiscation of illicit assets although no cases of confiscation of unexplained wealth or recovery of corrupt assets from abroad were reported. Armenia has been applying confiscation measures concerning bribes as instrumentalities of active bribery offences but did not demonstrate enough examples of confiscation of proceeds of corruption in criminal cases. There was no evidence of the enforcement of more sophisticated confiscation measures. Corporate liability is not autonomous from criminal proceedings against natural persons. A track record of high-level corruption investigations exists but the conviction rate was low. Some procedures for lifting immunities have notable deficiencies.

Figure 9.1. Performance level for the enforcement of corruption offences is high

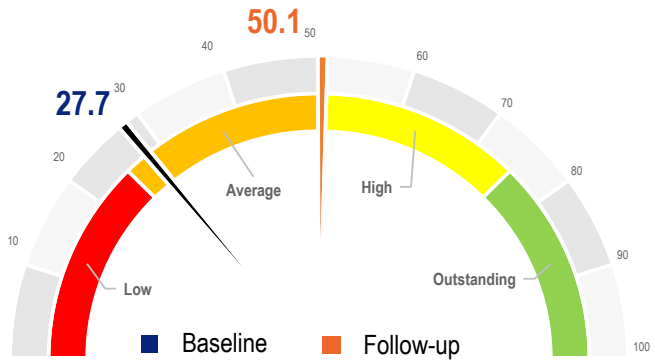
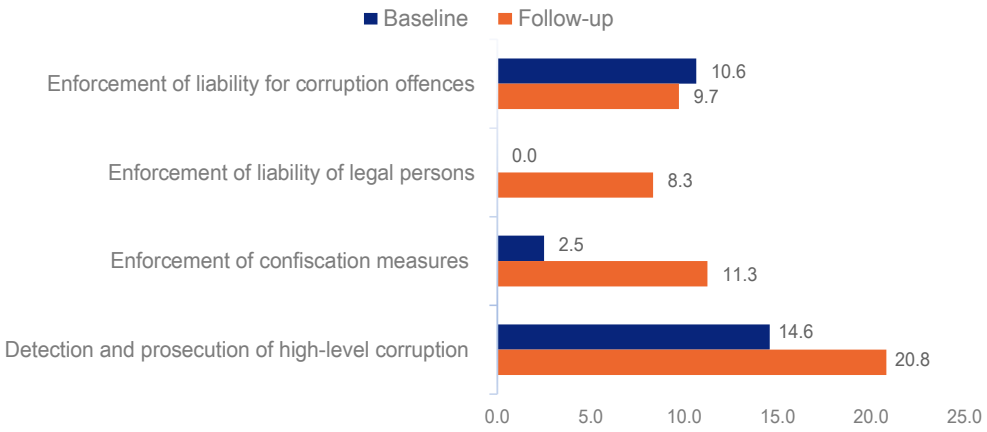


Figure 9.2. Performance level for the enforcement of corruption offences by indicators



Indicator 9.1. Liability for corruption offences is enforced

A new Criminal Code of Armenia, adopted in 2021 and enacted in mid-2022, with some parts taking effect in 2023, has introduced several important changes, such as revised rules for calculating the statute of limitations and the liability of legal persons for corruption and other offences.

During 2023-2024, Armenia demonstrated a growing number of convictions in cases of active and passive bribery in the public sector while trading in influence convictions are rare, and there is very limited enforcement of bribery in the private sector. Offers of bribes are regularly prosecuted but there are no examples of bribery with an intangible and non-pecuniary undue advantage. Armenia has also been actively implementing its Law on Confiscation of Property of Illicit Origin, which introduced civil confiscation of assets identified in criminal proceedings and unexplained assets of public officials. The provided copies of judgments illustrate the use of settlements in such civil confiscation cases. In its recent decision, the Constitutional Court of Armenia provided an interpretation of certain legal provisions regarding civil confiscation, confirming the necessity of establishing a link between a particular criminal offence and assets in most cases. Concerning the illicit assets of public officials that are not necessarily linked to criminal offences, the court specified that only assets acquired after assuming public office may be subject to confiscation. The country has several ongoing criminal investigations of corruption-related money

laundering and cases pending trial but none of them have resulted in a court verdict yet. At the same time, no investigation of foreign bribery has been started in the last three years. The prohibition on holding public positions serves as an additional punishment in certain corruption cases but dismissal is not yet an automatic consequence of a corruption-related conviction. The new Criminal Code does not include special exemptions from active bribery or trading in influence offences. The Code has also introduced new rules for calculating the statute of limitations, stipulating that it is calculated from the day following the completion of the crime until the decision is made to initiate criminal prosecution against the person. However, during 2023-2024, a significant number of cases were terminated or not opened due to the expiration of the statute of limitations. No cases were terminated during the reporting period due to the expiration of time limits for investigation or prosecution. Enforcement statistics on corruption offences were collected at the central level and published in annual reports on the official website of the General Prosecutor's Office comprehensively. However, this excludes data on confiscation measures applied, as well as disaggregated information on types of punishments, and types and levels of officials sentenced.

Benchmark 9.1.1.

Sanctions are routinely imposed for the following offences:

Element	Compliance	
	Baseline	Follow-up
A. Active bribery in the public sector	✓	✓
B. Passive bribery in the public sector	✓	✓
C. Active or passive bribery in the private sector	X	X
D. Offering or promising a bribe, bribe solicitation or acceptance of an offer/promise of a bribe	✓	✓
E. Bribery with an intangible and non-pecuniary undue advantage	X	X
F. Trading in influence	X	X

Note: Enforcement-related benchmarks of this Performance Area take into account first instance court sentences/decisions.

Based on case examples provided by Armenia, the Baseline Monitoring Report found the country compliant with benchmark elements concerning active and passive bribery in the public sector and offering or promising of a bribe, bribe solicitation or acceptance of an offer/promise of a bribe.

The statistics provided by Armenian authorities demonstrate a gradual increase in convictions for both active and passive bribery in the public sector. However, there is no separate statistical data on convictions for offering or promising a bribe, soliciting a bribe or accepting an offer or promise of a bribe as a stand-alone offence. Additionally, there is no data on bribery concerning intangible and non-pecuniary undue advantages

Table 9.1. Total number of convictions in 2022-24

Number of persons convicted for:	2022	2023	2024
Active bribery in the public sector	51	58	136
Passive bribery in the public sector	5	16	35
Active bribery in the private sector	0	1	0
Passive bribery in the private sector	0	0	1
Offering or promising a bribe as a stand-alone offence	17	N/A	N/A
Bribe solicitation or acceptance of an offer/promise of a bribe as a stand-alone offence	0	N/A	N/A
Bribery with an intangible and non-pecuniary undue advantage	2	N/A	N/A
Trading in influence	0	0	2

“Routinely imposed” means that for each element (A-F), the national authorities are required to provide at least three examples of specific cases of the first instance convictions delivered in 2024 for the respective offences. Armenia presented three examples of routine enforcement of active bribery in the public sector (element A), where bribes between the equivalent of USD 150 to 3 500 were attempted or given to low- or mid-level officials for acting in the interests of the bribe-givers, such as help with evading military service, issuing construction permits and overlooking committed violations. From the provided case examples, it is also possible to conclude that sanctions are routinely imposed for passive bribery in the public sector (element B). One of the case examples involved a former Minister convicted for accepting large-scale bribes and sentenced to both imprisonment and a fine. The other two examples concerned local-level officials taking bribes in exchange for administrative services, along with one additional case of passive bribery committed by an officer of the Military Conscription and Mobilisation Service of the Ministry of Defence. The convicted officials in the latter three cases were sentenced to imprisonment, with their sentences conditionally suspended. All those convicted were also barred by the court from holding public positions for varying terms. Armenia also provided three examples of bribes offered by drivers to Patrol Police officers. In all those cases, the convicted were sentenced to imprisonment conditionally suspended, with various probation periods.

Armenia is, therefore, compliant with benchmark elements B and D. However, no cases were provided for active or passive bribery in the private sector, bribery with an intangible and non-pecuniary undue advantage and trading in influence (elements C, E and F), making the country non-compliant with these elements of the benchmark.

Benchmark 9.1.2.

Element	Compliance	
	Baseline	Follow-up
Sanctions (measures) are routinely imposed for criminal illicit enrichment or non-criminal confiscation of unexplained wealth of public officials (unjustified assets)	X	X

At the time of the baseline assessment, there were no instances of sanctions applied for criminal illicit enrichment while the practice of non-criminal confiscation of unexplained wealth of public officials under the newly adopted Law on Confiscation of Property of Illicit Origin was evolving, with no court rulings yet established.

In accordance with Article 5, Part 1 of the Law, an examination of assets must be initiated when there are reasonable grounds to suspect their lawful origin under the following circumstances:

- a criminal case has concluded with a conviction but the assets were not confiscated
- there is an ongoing criminal investigation wherein the individual has been accused
- criminal prosecution or the initiation of an investigation is precluded due to factors such as the expiration of the statute of limitations, the application of amnesty, the individual's death or not reaching the legal age for criminal responsibility
- criminal proceedings have been suspended for objective reasons as outlined in the Criminal Procedure Code, such as when the accused person is a fugitive or has reached a co-operation agreement with the authorities
- information revealed following the operational intelligence measures prescribed by the Law On Operational Intelligence Activity that there are sufficient grounds to suspect that illegal assets belong to the official or the person affiliated with him or her

- information obtained through another civil confiscation process regarding assets belonging to officials or their affiliates.

For the follow-up evaluation, Armenia presented several examples of civil forfeiture of public officials' illicit assets ordered by the Anti-Corruption Court under the mentioned Law. However, in all these cases, the civil confiscation proceedings were initiated based on findings in pending criminal investigations as the Law (Article 5, Part 1, point 2) permits law enforcement authorities to pursue confiscation through civil action without waiting for the outcome of criminal proceedings. As further explained by the Armenian authorities, the existence of grounds for civil confiscation in such cases may be established by the presence of a decision to indict a person as an accused. While the recent developments in applying civil confiscation measures are commendable, the monitoring team is of the opinion that the provided case examples stand closer to the concept of non-conviction-based confiscation (as the confiscated assets may relate to the investigated criminal offences) (see Benchmark 9.3.4) than with the confiscation of unexplained wealth, where an investigation of a specific criminal offence is not necessarily a requirement. The latter mechanism, which is also applicable under the mentioned Law, even though in limited cases (under points 5 and 6 of Article 5, Part 1, of the Law), is not illustrated in the presented case examples.

The Law had been subject to review by the Constitutional Court of Armenia for over two years. In its ruling dated 16 April 2025, the Court concluded that points 1-4 of Part 1 of Article 5 of the Law, in conjunction with Part 1 of Article 24 of the same Law, comply with the Constitution based on the interpretation that the assets pertaining to a particular crime shall be subject to forfeiture. In its analysis, the Court pointed out that the purpose of the civil confiscation procedure is not to establish a criminal act for the purposes of criminal law but to demonstrate with a certain degree of certainty that the property subject to confiscation may have been derived from a criminal act. Under such circumstances, the link between the property subject to confiscation and the crime lies in the reasonable probability, based on the conduct exhibited by the individual, that the property in question was obtained as a result of the crime. Although the Court confirmed that the evidentiary threshold in forfeiture cases under the Law is lower than that required by criminal law, the aforementioned interpretation may complicate further application of the civil confiscation tool as a link between the assets and a specific offence, rather than criminal or other illegal activity in general, may be required. With respect to the grounds envisaged by points 5 and 6 of Part 1 of Article 5 of the Law, the Court concluded that they comply with the Constitution by the interpretation that only the assets acquired after the relevant official assumed office shall be subject to forfeiture. The monitoring team urges Armenia to consider expanding the grounds for initiating investigations and civil forfeiture claims concerning unexplained assets owned or controlled by public officials and their affiliates in situations unrelated to criminal investigations, such as the results of verifying asset declarations, integrity checks, and information received from the media.

Benchmark 9.1.3.

Element	Compliance	
	Baseline	Follow-up
There is at least one case in which the investigation of foreign bribery offences was started.	X	X

The Baseline Monitoring Report found that the country was not compliant with the benchmark. The reason for that conclusion was that the provided example of a criminal investigation (a truck driver offered a small bribe to the Russian Federation Ministry of Interior’s official to avoid administrative liability) was not conducted “in order to obtain or retain business or other undue advantages in relation to the conduct of international business”. Thus, the described criminal act did not correspond with Article 16 of the UNCAC.

For the follow-up assessment, authorities reported that two foreign bribery investigations were started, two cases were concluded in 2023, and one investigation was opened in 2024. However, the provided case example resembled the one analysed at the baseline stage – an Armenian citizen gave a bribe to a traffic police officer in Kazakhstan, which was not related to any business purposes. While the case concerns the bribery of a foreign public official, it does not align with the foreign bribery offence as defined by international standards so Armenia remains non-compliant with the benchmark.

Benchmark 9.1.4.

Sanctions are routinely imposed for the following offences:

Element	Compliance	
	Baseline	Follow-up
A. Money laundering with possible public sector corruption as a predicate offence	X	X
B. Money laundering is sanctioned independently of the predicate offence	X	X

The Baseline Monitoring Report found Armenia not compliant with the benchmark since only one case example of a money laundering case predicated by public corruption was provided but the case was not eligible because the court acquitted the defendant. Also, no examples of sanctions for autonomous money laundering were provided.

Despite the baseline report referencing numerous ongoing money laundering investigations linked to public corruption as the predicated offence, the authorities have yet to report any cases that resulted in a conviction. Furthermore, no convictions for stand-alone money laundering were recorded during the follow-up assessment period. During the onsite visit, the authorities further explained that, due to the complex nature of mutual legal assistance requests pending execution in foreign jurisdictions, the investigation into a number of money laundering cases was ongoing. During 2024, 11 such cases involving 28 defendants were submitted to the court and were pending trial at the time of preparing this report.

In the context of law enforcement efforts against money laundering, the Armenian Financial Intelligence Unit's (FIU's) Report on 2021-2023 National Assessment of Money Laundering and Terrorism Financing Risks acknowledges the need to strengthen the human and technical capacities of competent law enforcement agencies, along with enhancing their knowledge and experience (National Bank of Armenia, 2024[49]). The monitoring team reiterates that adequate resources and investments in enhancing the capacities of relevant agencies to detect, investigate, and prosecute complex corruption and related money laundering are important underlying factors in effectively combating corruption and financial crimes. Armenia is not compliant with the benchmark.

Benchmark 9.1.5.

Element	Compliance	
	Baseline	Follow-up
In all cases of conviction for a corruption offence, public officials are dismissed from the public office they held	X	X

According to the Baseline Monitoring Report, Armenia was not compliant with the benchmark because there was no automatic dismissal in all cases of conviction for a corruption offence. The deprivation of the

right to hold public office as a separate additional punishment was being applied at the discretion of the court, and provisions of the Civil Service Law stipulating that the civil servant should be dismissed if a guilty verdict against him/her enters into force did not cover all convictions and the entire range of public officials. The situation at the time of the follow-up assessment remains unchanged, as does the monitoring team's assessment. Thus, Armenia is not compliant with the benchmark.

Benchmark 9.1.6.

There are safeguards against the abuse of special exemptions from active bribery or trading in influence offences:

Element	Compliance	
	Baseline	Follow-up
A. Any special exemption from active bribery or trading in influence offence is applied, taking into account the circumstances of the case (that is not applied automatically)	✓	✓
B. The special exemption is applied on the condition that voluntary reporting is valid during a short period of time and before law enforcement bodies become aware of the crime on their own	✓	✓
C. The special exemption is not allowed when bribery is initiated by the bribe-giver	✓	✓
D. The special exemption requires active co-operation with the investigation or prosecution	✓	✓
E. The special exemption is not possible for bribery of foreign public officials	✓	✓
F. The special exemption is applied by the court or there is judicial control over its application by the prosecutor	✓	✓

Note: These safeguards can be stipulated in the legislation or official guidelines that are followed in practice.

As found by the Baseline Monitoring Report, the new Criminal Code of Armenia, adopted in 2021, no longer includes special exemptions from active bribery or trading in influence offences. The general release from liability in case of active repentance is still allowed for corruption offences but it is outside the benchmark. In the absence of further legislative amendments, Armenia remains compliant with all elements of the benchmark.

Benchmark 9.1.7.

No case of corruption offence by a public official is terminated because of:

Element	Compliance	
	Baseline	Follow-up
A. The expiration of the statute of limitations	X	X
B. The expiration of time limits for investigation or prosecution	✓	✓

According to the Baseline Monitoring Report, in 2022, there were public corruption cases terminated due to the expiration of the statute of limitations but no cases closed because of the expiration of time limits for investigation or prosecution.

The new Criminal Code, which entered into force in July 2022, has introduced new rules for calculating the statute of limitations, stipulating that it is calculated from the day following the completion of the crime until the decision is made to initiate criminal prosecution against the person. This is a positive development with

the potential to enhance the efficiency of securing justice in corruption cases, especially those that involve complex corruption schemes or high-level officials. However, the number of cases terminated or not opened due to expiration of the statute of limitations is significant even though this mainly concerns minor and mid-level cases. In 2023, criminal prosecution was terminated on this basis for 88 individuals (43 cases) of which cases on 11 individuals were terminated during the trial phase. In 2024, criminal prosecution was terminated for a total of 155 individuals (14 cases) of which 15 were during the trial phase. During the last two years, 8 cases were terminated by the court, and the Anti-Corruption Committee decided not to initiate or close criminal prosecution with respect to 198 individuals on that basis. No cases, however, were terminated during the reporting period due to the expiration of time limits for investigation or prosecution. Therefore, Armenia is not compliant with element A of the benchmark but is compliant with element B.

Benchmark 9.1.8.

Enforcement statistics disaggregated by the type of corruption offence are annually published online, including information on:

Element	Compliance	
	Baseline	Follow-up
A. Number of cases opened	✓	✓
B. Number of cases sent to the court	✓	✓
C. Number of cases ended with a sentence (persons convicted)	✓	✓
D. Types of punishments applied	✓	X
E. Confiscation measures applied	X	X
F. Types and levels of officials sanctioned	✓	X

The Baseline Monitoring Report found Armenia compliant with almost all elements of the benchmark except one concerning data on confiscation measures applied in corruption cases (element E).

The annual reports of the Prosecutor General's Office published on its website contain some data requested by the benchmark, namely figures on the number of opened cases, the number of cases sent to court, and the number of cases ended with a sentence, including the number of convicted individuals (2025[50]). At the same time, the reports contain information on the types of applied punishments as well as the categories and levels of convicted officials, without specifying the offences, which means this information is not disaggregated. The reports also include a separate chapter describing in detail the results of the work of the Department of Confiscation of Property of Illegal Origin of the Prosecutor General's Office. However, the information concerns only the application of civil confiscation under the Law on Confiscation of Property of Illicit Origin but not confiscation applied in criminal proceedings.

While the practice of collecting statistical data on corruption offences and publishing them in annual reports is commendable, Armenia is advised to enhance its data gathering and publication methods to include disaggregated data as required by the benchmark and to further improve its data analysis on high-level corruption. Armenia is compliant with elements A-C of the benchmark.

Benchmark 9.1.9.

Element	Compliance	
	Baseline	Follow-up
Enforcement statistics on corruption offences are collected at the central level	✓	✓

The Baseline Monitoring Report found that statistics on corruption cases are collected by the Prosecutor General's Office at the central level and published in annual reports on the official website. The system remains the same in the follow-up assessment period. Moreover, Armenia has been developing a new electronic statistical system for prosecutorial work. This system will include, among other features, statistical data on each corruption-related crime. The new system is expected to start collecting data in 2026. Armenia is compliant with the benchmark.

Indicator 9.2. The liability of legal persons for corruption offences is provided in the law and enforced

The new Criminal Code has introduced a quasi-criminal liability for legal persons, which is commendable. However, as it is currently regulated, corporate liability is not procedurally autonomous from criminal proceedings against natural persons, which significantly complicates its potential efficiency. The law does not establish minimum fines and grants significant discretion to the courts in defining financial penalties, which risks relatively low fines that lack sufficient deterrent effects and offers a wide range of conditions enabling legal persons to evade liability. While the law allows for non-monetary sanctions for legal persons, it does not provide an adequate due diligence defence. There have been no corruption cases involving legal persons since the introduction of corporate liability in Armenia.

Benchmark 9.2.1.

Element	Compliance	
	Baseline	Follow-up
The liability of legal persons for corruption offences is established in the law.	X	✓

Note: The liability of legal persons should be established at least for active bribery in the public and private sector, trafficking in influence (if criminalised in the country), and money laundering.

As mentioned in the Baseline Monitoring Report, Armenia has introduced a quasi-criminal liability of legal persons for corruption. Since the respective legal provisions entered into force at the beginning of 2023, Armenia was not compliant with the benchmarks of the present indicator, as this development occurred outside the baseline assessment period.

Core rules concerning the liability of legal persons are contained in Section 7 of the Criminal Code of Armenia. The corporate liability can be triggered by a criminal offence:

- committed by a person authorised to influence the activities or decisions of the legal entity or by a person representing the legal entity with the permission or instigation of such a person acting on behalf and for the benefit of the legal entity

- committed by a person authorised to influence the activities or decisions made by the legal entity or by a person representing the legal entity or an employee of the legal entity when the legal entity has not ensured the fulfilment of the obligations provided for by the legislation regulating its activity, which has led to the offence
- committed by a person who is authorised to influence the activities or decisions made by the legal entity or by a person representing the legal entity, acting on behalf of the legal entity or using the legal entity.

Thus, Armenia is compliant with the benchmark.

Benchmark 9.2.2.

Element	Compliance	
	Baseline	Follow-up
The liability of legal persons for corruption offences is autonomous and is not restricted to cases where the natural person who perpetrated the offence is identified, prosecuted, or convicted.	X	X

According to the Criminal Code (Article 123, Part 5), subjecting a natural person to criminal liability does not exclude the criminal liability of the legal entity for the same crime. Release of a natural person from criminal liability is not grounds for releasing a legal entity from criminal liability. The Criminal Procedure Code of Armenia (Article 437) stipulates that criminal proceedings against a legal person shall be conducted separately from those regarding a natural person and that the criminal liability of a natural person or the establishment of his or her guilt in another way shall not prejudice the proceedings against a legal person.

However, the formal initiation of proceedings against a legal entity is directly connected to procedural decisions concerning a natural person. It may be either a final conviction of an individual or the decision not to commence criminal prosecution against a natural person or terminate the existing case on non-rehabilitative grounds. This link to certain decisions in proceedings against a natural person leads to the conclusion that corporate liability is not autonomous regarding procedural aspects. For example, in a situation where a criminal case against a natural person is ongoing, the proceedings against a legal person cannot be commenced until the final conviction or termination of the case on specific grounds. This approach presents several potential challenges for the effective functioning of corporate liability in Armenia. Criminal proceedings against natural persons, particularly in complex cases involving multiple individuals, can be time-consuming and complicated by other factors. Armenia is not compliant with the benchmark.

Benchmark 9.2.3.

Element	Compliance	
	Baseline	Follow-up
The law provides for proportionate and dissuasive monetary sanctions for corporate offences, including taking into account the amount of the undue benefit paid as a bribe or received as proceeds	X	X

As envisaged by the Criminal Code, the court shall determine the possibility of imposing a fine on a legal entity and the amount of the fine, taking into account the seriousness of the crime, property or non-material benefits gained from the crime, financial situation of the legal entity, the entity's capacity to earn income or

the existence of any assets it possesses that could be seized. The amount of the fine should be proportionate to the severity of the crime and not exceed 20% of the legal entity's gross income during the year preceding the committing of the crime. The law does not establish the lowest possible fine. Furthermore, the fine must not be so substantial as to directly cause bankruptcy or the cessation of operations for the legal entity.

If the legal entity cannot pay the imposed fine immediately and in full, the court should set a maximum term of three years for the payment of the fine or allow payment by instalments within the same period. If, after the imposition of the fine, the financial situation of the legal entity deteriorates to the extent that it can no longer pay, the court, upon the motion of the legal entity, may extend the deadline for payment of the fine by a maximum of three years. If the fine is not paid, the court will confiscate property equivalent to the fine, provided such property is available. If such property is unavailable, the fine can be replaced by a temporary suspension of the right to undertake certain activities.

The Criminal Code also requires consideration of several factors at sentencing, including the causes and conditions that contributed to the crime, measures taken by the legal entity to neutralise the consequences of the crime, legal interests of good-faith participants or shareholders of a legal entity who were not and could not be aware of the criminal offence, and circumstances characterising the legal entity. Additionally, the Criminal Code permits the release of legal entities from liability under the same conditions as for individuals (if they apply to legal entities), such as voluntary renunciation of the crime, active repentance, and reconciliation with the victim. A legal entity will also be released from criminal liability if it has remedied the causes and conditions that contributed to the committing of the criminal offence, if any; compensated for the damage caused; addressed other consequences of the alleged crime; and returned property acquired as a result of the criminal offence, including any income received.

The monitoring team believes that the provisions mentioned above grant the court excessive discretion in determining the amount of the fine imposed on a legal entity. This risks relatively low fines with insufficient deterrent effects and offers a wide range of conditions enabling legal persons to evade liability. Armenia is not compliant with the benchmark.

Benchmark 9.2.4.

Element	Compliance	
	Baseline	Follow-up
The law provides for non-monetary sanctions (measures) applicable to legal persons (for example, debarment from public procurement or revocation of a license)	X	✓

In addition to fines, Armenian legislation includes three non-monetary sanctions that may be imposed on legal persons. Specifically, these are as follows:

- temporary suspension of the right to engage in specific types of activities
- prohibition on conducting activities within the territory of Armenia
- compulsory liquidation.

If a legal entity evades compliance and continues engaging in prohibited activity, the sanction is replaced by an exceptional measure — compulsory liquidation. However, this form of non-monetary sanction cannot be imposed on legal persons operating in regulated sectors of public services and those for which the suspension of activities is subject to a special procedure defined by the Constitution or other legal acts. Thus, Armenia is compliant with the benchmark.

Benchmark 9.2.5.

Element	Compliance	
	Baseline	Follow-up
The legislation or official guidelines allow due diligence (compliance) defence to exempt legal persons from liability, mitigate, or defer sanctions, considering the case circumstances.	X	X

According to Article 124 of the Criminal Code, a legal entity is not subject to criminal liability if its participants, shareholders or members have taken all reasonably necessary measures to prevent the committing of the crime but it was practically impossible to prevent the crime. This defence is quite limited as it overlooks actions taken by the management team or the board of directors of a legal entity – bodies that usually deal with creating and enforcing compliance policies and procedures in business structures.

According to the Monitoring Guide, establishing exemption from liability when the company implements a robust compliance system promotes implementation in companies of adequate internal control, ethics, and compliance programmes or measures. Due diligence defence allows companies to avoid sanctions when the offence was committed by the company's employee despite systemic measures taken by the company's leadership to prevent such acts.

However, the defence currently present in the Armenian Criminal Code is relatively narrow and fails to clearly address compliance systems. It is not supported by any explanatory materials that would clarify to companies what kind of compliance measures might be sufficient as mitigating factors or for exemption from liability. As a result, the introduction of corporate liability in Armenia does not appear to have encouraged a more proactive development and implementation of compliance programmes by the private sector. Therefore, the country is not compliant with the benchmark.

Benchmark 9.2.6.

The following sanctions (measures) are routinely applied to legal persons for corruption offences:

Element	Compliance	
	Baseline	Follow-up
A. Monetary sanctions	X	X
B. Confiscation of corruption proceeds	X	X
C. Non-monetary sanctions (for example, prohibition of certain activities)	X	X

During the follow-up assessment, no legal persons were held liable for corruption while seven investigations unrelated to corruption were ongoing, so Armenia is not compliant with any element (A-C) of the benchmark. The country is urged to review its corporate liability model to address the deficiencies analysed above under this indicator and invest in building the capacity of its law enforcement agencies to detect, investigate, and prosecute cases against legal persons.

Indicator 9.3. Confiscation measures are enforced in corruption cases

Armenia has been routinely applying confiscation measures with respect to bribes as instrumentalities of active bribery offences but did not demonstrate a sufficient number of examples of confiscation of proceeds of corruption offences.

There was no evidence of enforcement in 2023-2024 of more sophisticated confiscation measures, such as confiscation of indirect proceeds or mixed proceeds of corruption, while there is a practice of applying equivalent (value-based) confiscation in corruption cases. The enforcement of the Law on Confiscation of Property of Illicit Origin has already resulted in non-conviction-based confiscation judgements while no extended confiscation orders have been issued within the last two years. The country has also achieved an impressive level of enforcement of 100% confiscation orders in corruption cases.

Benchmark 9.3.1.

Confiscation is routinely applied regarding:

Element	Compliance	
	Baseline	Follow-up
A. Instrumentalities of corruption offences	X	✓
B. Proceeds of corruption offences	✓	X

At the time of the baseline evaluation, Armenian authorities provided case examples of confiscating bribes, which were sufficient to find the country compliant with element B of the benchmark.

For the follow-up assessment, the authorities informed the team that during 2023, instrumentalities of corruption were confiscated in seven cases and proceeds in 24 cases while during 2024, there were no confiscation measures applied to instrumentalities of corruption and proceeds of corruption were confiscated in 11 cases. Armenia also provided three examples of confiscating bribes as instrumentalities of corruption in active bribery cases, all minor cases concerning attempts to bribe traffic police officers. This is sufficient to find the country compliant with element A of the benchmark.

Concerning confiscating proceeds of corruption, Armenia presented three case examples, two of which illustrate confiscation measures being applied to bribes or their equivalent in passive bribery cases. In one of these cases, public officials received bribes for administrative services; in the other, a public official took bribes to certify completed construction projects.

In the third case, confiscation was applied to the money received by an individual for its supposed further transfer to public officials, which he did not, however, intend to make. The defendant in the case was convicted for the offence envisaged by Article 440, Part 2, of the Republic of Armenia (RA) Criminal Code, which is receiving property, including financial means, security, another payment instrument, property rights, service or any other advantage under the pretext of solicitation of bribery. However, such an offence is beyond the scope of the definition of corruption offences applied for the Fifth Round of the IAP Monitoring. Therefore, Armenia is not compliant with element B of the benchmark.

Benchmark 9.3.2.

Element	Compliance	
	Baseline	Follow-up
Confiscation orders in at least 50% of corruption cases are fully executed	X	✓

The Baseline Monitoring Report found Armenia not compliant with the benchmark since the authorities were not able to provide statistics on the enforcement of confiscation orders in corruption cases.

During the follow-up assessment, Armenian authorities informed the monitoring team that 100% of all 39 confiscation orders issued in corruption cases were enforced during 2023-2024. The authorities confirmed this information during the on-site visit. The monitoring team received no information that would challenge that enforcement rate. Armenia is compliant with the benchmark.

Benchmark 9.3.3.

The following types of confiscation measures were applied at least once in corruption cases:

Element	Compliance	
	Baseline	Follow-up
A. Confiscation of derivative (indirect) proceeds of corruption	X	X
B. Confiscation of the instrumentalities and proceeds of corruption offences transferred to informed third parties	X	X
C. Confiscation of property the value of which corresponds to instrumentalities and proceeds of corruption offences (value-based confiscation)	X	✓
D. Confiscation of mixed proceeds of corruption offences and profits therefrom	X	X

The Baseline Monitoring Report did not find examples of any confiscation required by the benchmark so the country did not comply with it at that stage. During the follow-up assessment, authorities informed the monitoring team about 11 cases of equivalent or value-based confiscation and provided two examples of such confiscation so the country is now compliant with element C of the benchmark. Other forms of confiscation required by the benchmark (elements A-B, D) were not applied during the reporting period.

Benchmark 9.3.4.

The following types of confiscation measures were applied at least once in corruption cases:

Element	Compliance	
	Baseline	Follow-up
A. Non-conviction-based confiscation of instrumentalities and proceeds of corruption offences	X	✓
B. Extended confiscation in criminal cases	X	X

The Baseline Monitoring Report noted lawsuits seeking confiscation of property of illicit origin filed in court by the specialised Prosecutor's Office department under the Law on Confiscation of Property of Illicit Origin

and welcomed implementation of a new instrument of civil confiscation of unjustified assets. However, in the absence of judgments during the baseline evaluation, Armenia was not compliant with element A of the benchmark. The Baseline Monitoring Report also made a conclusion on the country's non-compliance with element B as Armenia's criminal law did not include an instrument for extended confiscation.

For the follow-up assessment, the authorities provided information about the results of applying civil confiscation under the mentioned law. During 2023-2024, the Department for Confiscation of Illicitly Acquired Property of the Prosecutor General's Office initiated 245 investigations (82 in 2023 and 163 in 2024). During this period, 117 claims for confiscating illicitly acquired property were submitted to the Anti-Corruption Court (73 in 2023 and 44 in 2024), 1 claim was dismissed by the first instance court, and 3 cases were under review by the appeal court. In 2024, the Anti-Corruption Court issued judgments ordering the confiscation of illicitly acquired property belonging to five individuals. The total value of the property subject to confiscation in favour of the Republic of Armenia is approximately AMD 2 246 007 (around EUR 5.1 million). Armenia also provided two examples of civil confiscation related to assets involved in ongoing criminal investigations (at the time of initiating the inquiries regarding the respective assets) into abuse of power by low- and mid-level public officials. In both cases, the first instance court issued confiscation orders, which have been appealed to the Anti-Corruption Court of Appeal. Overall, of all the claims in 2023-2024, one was dismissed by the first instance court, and three were under review by the appeal court. The monitoring team welcomes the developing practice of applying the civil confiscation tool and concludes that the country is compliant with element A of the benchmark. At the same time, no criminal law-extended confiscation tools have been introduced, which leads the monitoring team to conclude that Armenia is not compliant with element B of the benchmark.

Benchmark 9.3.5.

Measures are taken to ensure the return of corruption proceeds

Element	Compliance	
	Baseline	Follow-up
A. The return of corruption proceeds from abroad happened at least once	X	X
B. The requests to confiscate corruption proceeds are routinely sent abroad	X	X

The Baseline Monitoring Report found Armenia not compliant with the benchmark as there were no cases of asset return during the evaluated period, and all requests sent to foreign jurisdictions sought information about the property rather than confiscation.

For the follow-up assessment, authorities provided one example of a successful confiscation in the United States of allegedly corrupt proceeds owned by the family of a former Armenian high-level official. According to the agreement reached with the U.S. authorities, at least 80% of the proceeds from the sale of the confiscated property – a total estimated value of USD 39 million – should be returned to Armenia. Although this example highlights the commendable asset recovery efforts of the Armenian authorities, without the actual return of the mentioned assets, the monitoring team cannot conclude that the country complies with element A of the benchmark. In 2024, the Department for Confiscation of Illicit Assets of the Prosecutor General's Office sent 17 international inquiries with the purpose of identifying and tracing assets, which again demonstrates Armenia's proactive approach to applying civil confiscation measures with respect to illicit assets. However, in 2023-2024, no requests were sent to foreign jurisdictions to confiscate corruption proceeds. Armenia is not compliant with any element (A-B) of the benchmark.

Indicator 9.4. High-level corruption is actively detected and prosecuted

Enforcement of corruption offences against high-level officials remained very low in Armenia in 2023-2024. There were two cases of conviction of high-level officials, and in both cases, punishment in the form of imprisonment was applied without conditional or other types of release. In two corruption cases involving officials with immunity, the authorities did not face challenges in lifting these immunities despite some regulations lacking sufficient detail. The monitoring team did not discover any public allegations of high-level corruption that were left unreviewed or uninvestigated.

Benchmark 9.4.1.

Element	Compliance	
	Baseline	Follow-up
At least 50% of punishments for high-level corruption provided for imprisonment without conditional or any other type of release	X	✓

Note: Only aggravated bribery offences punishable with imprisonment are taken into account.

The Baseline Monitoring Report concluded that Armenia was not compliant with the benchmark, as conditional release from imprisonment was applied in the only high-level corruption conviction.

For the follow-up assessment, Armenia reported one high-level aggravated bribery conviction (of the head of the central executive body) in 2023 and one (of a former Minister) in 2024. In both cases, punishment in the form of imprisonment was applied without conditional or other types of release. Thus, Armenia is compliant with the benchmark. However, the monitoring team recommends that Armenia clearly prioritise combating high-level corruption in the work of the Anti-Corruption Committee and the respective department of the Prosecutor General's Office.

Benchmark 9.4.2.

Immunity of high-level officials from criminal investigation or prosecution of corruption offences:

Element	Compliance	
	Baseline	Follow-up
A. Is lifted without undue delay	✓	✓
B. Is lifted based on clear criteria	X	X
C. Is lifted using procedures regulated in detail in the legislation	✓	X
D. Does not impede the investigation and prosecution of corruption offences in any other way	✓	✓

As found by the Baseline Monitoring Report, immunity in Armenia is provided for the following officials and persons: Deputies (members) of the National Assembly; President of the Republic; judges of the Constitutional Court and judges of general jurisdiction courts; Human Rights Defender; members of the Central Election Commission; candidates for National Assembly Deputy and elected Deputies before assuming his/her powers as a Deputy. At the time of the previous assessment, there was one case of lifting immunity of a judge, which was done without delay. The monitoring team also found that procedures for lifting judicial immunity were sufficiently regulated, and the immunity did not impede the investigation

or prosecution of the corruption offence in any other way. However, the legislation did not provide any criteria for lifting immunity.

During the reporting period, there were two cases of lifting immunity in corruption cases. In one of these cases, the immunity of a judge was lifted by a decision of the Supreme Judicial Council the next day after receiving a petition by the Prosecutor General. In the other case, a Member of Parliament was deprived of his immunity by a decision of the National Assembly made 12 days after receiving a motion from the Prosecutor General. The authorities confirmed that they do not face any specific difficulties or challenges in lifting the immunities of Members of Parliament. They provided two additional examples of parliamentary immunities being lifted in criminal cases, although not corruption-related.

When it comes to regulating the lifting of immunities of Members of Parliament, the Rules of Procedure of the National Assembly (Article 98) include some features concerning the discussion of respective petitions from the Prosecutor General in Parliament, such as the order of debates and timing of interventions. However, these regulations do not specify any timeframe for presenting the petition for Parliament's consideration and decision-making, and lack any criteria for lifting immunity. Thus, the monitoring team concludes that Armenia is compliant with elements A and D but not elements B and C.

Benchmark 9.4.3.

Element	Compliance	
	Baseline	Follow-up
No public allegation of high-level corruption was left unreviewed or uninvestigated (50%) or where decisions not to open or to discontinue an investigation were taken and explained to the public (50%)	✓	✓

Note 1: The monitoring team will provide to the government the list of public allegations it has uncovered (if any) if such allegations were made during the calendar year preceding the year of monitoring. The government provides to the monitoring team detailed information on the initial review and investigation of each case, including explanation of reasons to terminate or not to pursue the investigation. The government also provides links to the publication of information on the outcomes of such review or investigation for each case. The said publication must happen before the submission of the country's replies to the monitoring questionnaire. The publication may exclude information that is harmful to the investigation of other cases.

Note 2: Public allegations mean allegations that are available in the public domain and are disseminated by reputable local or international mass media or sourced to a reputable local or international organisation. The allegation should include verifiable statements of fact about specific persons and alleged violations. The monitoring team decides whether the mass media outlet or organisation is considered reputable based on the feedback of non-governmental and governmental stakeholders and including such factors as the period of operation, whether frequently cited by other stakeholders or mass media, whether it is a regular online publication of information about the organisation's activity in the anti-corruption area, etc.

The Baseline Monitoring Report did not uncover any public allegations of high-level corruption that were left unreviewed or uninvestigated or where a decision not to open an investigation or discontinue it was made and not explained to the public.

The monitoring team did not discover any such cases either. The monitoring team specifically asked the authorities to provide information about four corruption allegations publicly reported by investigative journalists. Authorities confirmed that in two of these cases, the reports were being examined by criminal intelligence units, while in the other two cases, criminal investigations were ongoing. At the same time, the Armenian anti-corruption activists criticised the lack of progress or lack of information regarding the ongoing investigation of one of the high-profile cases (Radio Free Europe/Radio Liberty, 2025[51]). Armenia is compliant with the benchmark.

Assessment of non-governmental stakeholders

Some non-governmental stakeholders highlighted potential manifestations of political influence during court proceedings in certain corruption cases and urged the implementation of unobstructed mechanisms for detecting corruption crimes and ensuring accountability, free from any political interference or selective approaches. Also, some stakeholders stressed the increased attention of the Prosecutor General's Office to combating corruption while others questioned this opinion and suggested said stakeholders lacked independence and objective decision-making. At the same time, they pointed to a large number of suspended or terminated criminal proceedings, which, in their view, points to problems with evidence collection and resource allocation in addition to legislative ambiguities, institutional constraints, judicial system challenges, limited whistleblower protections, and issues related to public trust and international co-operation.

With respect to statistical data collection and publication, some stakeholders noted that reports from the Prosecutor General's Office are not in an "open data" format, hindering effective use, and that data collection is neither systematic nor professional. Data on high-level corruption cases are not disaggregated either.

Some stakeholders recommended the following:

- invest in advanced investigative tools and training to enhance the quality and reliability of evidence gathered in corruption cases
- conduct comprehensive reviews of prosecutorial and judicial procedures to identify and rectify systemic issues that lead to high dismissal rates
- hold prosecutors and judicial officers accountable for unjustified suspensions or dismissals of corruption cases, ensuring adherence to legal standards and ethical practices
- publish anti-corruption reports and statistical data in open, machine-readable formats to facilitate public access, analysis, and scrutiny
- adopt standardised data collection and reporting protocols that align with international standards, such as those set by the OECD, to ensure consistency and reliability
- ensure the collection of disaggregated data, particularly on high-level corruption cases, to enable detailed analysis and targeted interventions.

Regarding the liability of legal persons, non-governmental stakeholders highlighted uncertainty in enforcement standards, which potentially undermines the deterrent effect of the legal liability framework and may discourage companies from investing in robust compliance programmes.

Stakeholders also recommended the following:

- revise the principles of applying a fine sanction to legal entities under the Criminal Code, eliminating the ban on imposing a fine greater than 20% of the gross annual income and defining the amount of the fine as a multiplier of the illegally obtained income
- improve the statistics and management of unified statistics on criminal proceedings related to legal persons.

With respect to the application of civil confiscation measures against illicit assets, non-governmental stakeholders acknowledged the developing practice of the application of the new law and respective efforts by the specialised department of the Prosecutor General's Office. However, they raised concerns about the delay in improving the illicit asset forfeiture mechanism. Some mentioned that around 30% of confiscation cases are resolved through settlements, the principles of which are not disclosed to the public.

Additionally, some stakeholders pointed out problems with the operational independence of the specialised department of the Prosecutor General's Office, delays in judicial resolution of initiated cases, and the absence of professionals such as forensic accountants, statisticians, and legal experts.

The recommendations of non-governmental stakeholders in this area are as follows:

- Improve the transparency and accountability of stolen asset confiscation and recovery processes, ensuring publicly available data on assets confiscated and placed in public (or trust) management that include at least information on their location, type, value, owners, new managers, income allocation, etc.
- Create a participatory model for the management of confiscated assets and allocation of income with consideration of revealed needs and proposals by relevant civil society actors
- Provide the specialised department of the Prosecutor General's Office with sufficient resources and enhance its capacities, especially in the area of international co-operation.

Regarding combating high-level corruption, non-governmental stakeholders note some progress achieved by the Anti-Corruption Committee in completing a significant number of cases and launching high-profile investigations, including some involving politically connected former officials. However, law enforcement efforts are still primarily focused on corruption among low- and mid-level officials while high-level corruption is often addressed with a preference for offences committed by former officials rather than those currently in office.

References

Armenian civil society organisations (2023), *Alternative Evaluation Report on Implemenation of Anti-Corruption Strategy (2019-2022)*, https://armla.am/en/wp-content/uploads/sites/2/2023/07/AC-2019-22-Strategy-2022-monitoring-final-eng.pdf. [15]

Armenian Lawyers' Association (2024), *Hidden Aspects of the Anti-Corruption Committee Chairman Candidates Selection*, https://armla.am/en/9308.html. [44]

Armenpress (2024), *Supreme Judicial Council Chair resigns*, https://armenpress.am/en/article/1205152. [40]

Corruption Prevention Commission of Armenia (2025), *Register of Asset and Interest Declarations of Armenia*, https://cpcarmenia.am/en/declaration-register/. [23]

European Court of Human Rights (2025), *Judgement on Case of Suren Antonyan v. Armenia*, https://hudoc.echr.coe.int/eng/#{%22itemid%22:[%22001-240206%22]}. [42]

Factor News (2024), *Who is judging? There are judges in Armenia who have criminal cases and are involved in politics*, https://factor.am/810834.html#:~:text=%D4%B4%D5%A1%D5%BE%D5%AB%D5%A9%20%D5%8D%D5%A1%D6%80%D5%A3%D5%BD%D5%B5%D5%A1%D5%B6,%D6%84%D6%80%D5%A5%D5%A1%D5%AF%D5%A1%D5%B6%20%D5%A3%D5%B8%D6%80%D5%AE%D5%B8%D5%BE%2C%20%D5%B8%D6%80%D5%A8%20%D5%AF%D5%A1%D6%80%D5%B3%D5. [37]

Government of Armenia (2025), *Case Law Database of Armenia*, https://datalex.am/. [32]

Government of Armenia (2023), *Anti-Corruption Strategy (2023-2026)*, https://www.moj.am/en/page/583. [7]

Government of Armenia (2023), *Electornic Government (E-GOV) Armenia*, https://www.e-gov.am/sessions/archive/2023/10/26/. [12]

Government of Armenia (2022), *Decision 560*, https://www.arlis.am/documentview.aspx?docid=172607. [26]

IRAVABAN.NET News (2025), *Strange Voting Patterns: The Hidden Aspects of the Anti-Corruption Committee Chairman Selection Interview Phase*, https://iravaban.net/en/513568.html. [46]

Ministry of Economy of Armenia (2024), *Order No. 1995*, https://mineconomy.am/media/31315/Rule%20book.pdf. [27]

Ministry of Finance of Armenia (2025), *Centralised Procurement Platform*, https://gnumner.minfin.am/en/. [31]

Ministry of Finance of Armenia (2025), *E-Procurement Platform of Armenia*, https://www.armeps.am/epps/home.do. [30]

Ministry of Justice (2023), *Final Monitoring and Evaluation Report of Anti-Corruption Strategy (2019-2022) of Armenia*, https://moj.am/storage/files/pages/pg_7967694028641_AC_M-A_Report_final_2023-compressed_1_.pdf. [8]

Ministry of Justice of Armenia (2025), *Monitoring Report 2024 of Anti-Corruption Strategy*, https://moj.am/storage/uploads/Annual_Report_2024.pdf. [13]

Ministry of Justice of Armenia (2025), *Platform for Publication of Legal Acts*, https://www.e-draft.am/en. [16]

Ministry of Justice of Armenia (2025), *State Register of the Legal Entities of Armenia*, https://www.e-register.am/en/. [29]

Ministry of Justice of Armenia (2023), *Evauation Report of Anti-Corruption Strategy (2019-2022)*, https://www.moj.am/storage/files/pages/pg_7967694028641_AC_M-A_Report_final_2023-compressed_1_.pdf. [14]

Ministry of Justice of Armenia (2023), *Platform for the Publication of Legal Acts of Armenia*, https://www.e-draft.am/en/projects/5986. [10]

Ministry of Justice of Armenia (2023), *Public Consultation Platform on Draft Legal Acts of Armenia*, https://www.e-draft.am/projects/5986. [52]

Ministry of Justice of Armenia (2023), *Unified Website of the Publication of Regulatory Legal Acts*, https://www.arlis.am/hy/acts/184674. [11]

National Bank of Armenia (2024), *Key findings of the Report on 2021-2023 National Assessment of Money Laundering and Terrorism Financing Risks*, https://old.cba.am/en/SitePages/fmcstrategicanalyses.aspx. [49]

OECD (2024), *Armenia, Azerbaijan, Moldova and Ukraine take promising steps to fight corruption but should improve enforcement and promote business integrity*, https://www.oecd.org/en/about/news/press-releases/2024/03/armenia-azerbaijan-moldova-and-ukraine-take-promising-steps-to-fight-corruption-but-should-improve-enforcement-and-promote-business-integrity.html. [3]

OECD (2024), *Baseline Report of the Fifth Round of Monitoring of Anti-Corruption Reforms in Armenia: The Istanbul Anti-Corruption Action Plan*, OECD Publishing, Paris, https://doi.org/10.1787/fb158bf9-en. [6]

OECD (2024), *Much stronger measures are needed to address corruption in five Central Asian countries*, OECD, https://www.oecd.org/en/about/news/announcements/2024/11/much-stronger-measures-are-needed-to-address-corruption-in-five-central-asian-countries.html. [4]

OECD (2022), *Istanbul Anti-Corruption Action Plan 5th Round of Monitoring Assessment Framework*, OECD Publishing, Paris, https://doi.org/10.1787/6840c3f5-en. [1]

OECD (2022), *Monitoring Guide, IAP Fifth Round of Monitoring*, OECD Publishing, Paris, https://doi.org/10.1787/2ca61fcd-en. [2]

OECD (2020), *Anti-corruption Reforms in Eastern Europe and Central Asia: Progress and Challenges, 2016-2019*, OECD Publishing, Paris, https://doi.org/10.1787/9e621f2f-en. [5]

Pariament of Armenia (2021), *Criminal Procedure Code of Armenia*, https://www.arlis.am/documentview.aspx?docid=205057. [25]

Parliament of Armenia (2024), *Code of Conduct of State Officials of Armenia*, https://www.arlis.am/DocumentView.aspx?DocID=189669. [20]

Parliament of Armenia (2018), *CIvil Service Law of Armenia*, https://www.arlis.am/DocumentView.aspx?DocID=200941. [21]

Parliament of Armenia (2018), *Judicial Code of Armenia*, https://www.arlis.am/documentview.aspx?docid=199816. [34]

Parliament of Armenia (2018), *Law on Normative Legal Acts of Armenia*, https://www.arlis.am/DocumentView.aspx?docID=123348. [9]

Parliament of Armenia (2018), *Law on Public Service of Armenia*, https://www.arlis.am/hy/acts/120832. [17]

Parliament of Armenia (2018), *Law on Whistleblower Protection*, https://www.arlis.am/DocumentView.aspx?DocID=172131. [24]

Parliament of Armenia (2017), *Rules of Procedure of the National Assembly of Armenia*, http://www.parliament.am/legislation.php?sel=show&ID=5711. [35]

Parliament of Armenia (2017), *Law on Corruption Prevention Commission*, https://www.arlis.am/hy/acts/114355. [18]

Parliament of Armenia (2017), *Law on Prosecution Office of Armenia*, https://www.arlis.am/hy/acts/117713. [19]

Parliament of Armenia (2015), *Constitution of Armenia*, https://www.president.am/en/constitution-2015/ (accessed on 9 April 2025). [33]

Parliament of Armenia (1985), *Law on Administrative Violations of Armenia*, https://www.arlis.am/documentview.aspx?docid=201371. [22]

Prosecutor General's Office of Armenia (2025), *Activity Reports of the Prosecutor General's Office*, https://www.prosecutor.am/en/dynamicWebPages/report. [50]

Protection of Rights Without Borders (2025), *Summary of observations of the election process of the ACC chairperson*, https://prwb.am/wp-content/uploads/2025/02/Summary-of-the-observation-results-of-the-election-of-candidate-for-the-chairman-of-the-Anti-Corruption-Committee-1.pdf. [45]

Radio Free Europe/Radio Liberty (2025), *Cover-Up Feared In Corruption Probe Of Armenian Investment Fund*, https://www.azatutyun.am/a/33377602.html. [51]

Reuters (2024), *Top Armenian officials leave posts after PM Pashinyan asks for resignations*, https://www.reuters.com/world/asia-pacific/armenian-pm-pashinyan-says-he-has-asked-various-high-ranking-officials-step-down-2024-11-18/. [47]

State Register Agency of Legal Entities of Armenia (2025), *Beneficial Ownership Electronic Declaration System*, https://bo.e-register.am/en/auth. [28]

Supreme Judicial Council of Armenia (2024), *Appointment Decision 106-O-257*, https://court.am/hy/decisions-single/2314. [36]

Transparency International Armenia (2025), *Assessment of the Activity of the Anti-Corruption Committee*, https://transparency.am/hy/publication/pdf/395/11949. [48]

Venice Commission (2024), *Opinion on draft amendments to the Judicial Code of Armenia*, https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD%282024%29031-e. [38]

Venice Commission (2022), *Compilation of Opinions and Reports concerning Prosecutors*, https://www.venice.coe.int/webforms/documents/?pdf=CDL-PI(2022)023-e. [43]

Venice Commission (2022), *Opinion on draft amendments to the Judicial Code of Armenia*, https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2022)044-e. [41]

Venice Commission (2017), *Opinion on the draft Judicial Code of Armenia*, https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2017)019-e. [39]

Notes

[1] Georgia opted out from the IAP fifth round of monitoring.

[2] Review of Ukraine was carried out with a reduced substantive scope, covering selected areas under the Assessment Framework due to Russia's large-scale war of aggression against Ukraine.

[3] The approval of the CGC followed the addition of Article 76.1 to the Civil Code of Armenia, which granted the Minister of Economy the authority to approve the CGC.

[4] Point 47 of Article 8 of the Rules on Securities Listing and Admission to Trading of the Armenia Securities Exchange OJSC, the only securities market operator in Armenia.

[5] Paragraph 88, point 1) of Article 18 of the Rules on Securities Listing and Admission to Trading of the Armenia Securities Exchange OJSC.

[6] The number of submitted declarations is larger than the number of legal entities since a legal entity may submit multiple declarations in a year.

[7] Article 294 of the Criminal Code of the Republic of Armenia pertains to submitting false information about beneficial owners or concealing information to be submitted. As of the time of monitoring assessment, the case was in the main hearing stage in court.

8 Part a) of clause 4 of the Republic of Armenia Government Decree No. 1694-N dated 6 November 2003.

[9] The government provided the Procedure on Conducting a Competition for Selection (Appointment) of Executive Bodies in the State Non-Commercial Organisations and Closed Joint-Stock Companies with 100% State Ownership under the Ministry of Territorial Administration and Infrastructure of the Republic of Armenia, approved by Minister Order No. 51-L dated 15 July 2020 (https://api.mtad.am/storage/pages/files/2022/03/pdf/16_16-26-sc499-62e1601becfa6.pdf.

[10] The 2026 performance target for Action 4.3 of the Action Plan for the Government's 2023-2026 Anti-Corruption Strategy specifies implementation of corruption risk assessment and mitigation programmes in at least five of the largest state-owned enterprises (ANPP, HVEN, Yerevan TPP, Jrar, and SGLMC).

[11] In 2023 the CPC developed a methodology for assessing corruption risks in SOEs within the scope of the 4th component of the EU Twinning Programme "Promoting Integrity and Preventing Corruption in the Armenian Public Sector". Based on the methodology, a pilot risk assessment was conducted in three organisations – a government-owned closed joint-stock company, a state non-commercial organisation, and a community non-commercial organisation. The CPC published the report on the Outcomes of the

Corruption Risks Pilot Assessment in December 2024 (https://cpcarmenia.am/wp-content/uploads/2024/12/CRA_REPORT-26.12.2024.pdf).

[12] Included in the Activities Plan of the Strategic Program for the Development of the Energy Sector of the Republic of Armenia (until 2040) approved by the Republic of Armenia Government Decree No. 48-L dated 14 January 2021.

[13] ANPP (https://anpp.am/ar/report/) did not contain annual financial statements; for HVEN, Yerevan TPP and Jrar, annual financial statements for 2023 were published on company websites (respectively, https://www.hven.am/hy/tegekatvutyun/reports, http://www.ytpc.am/hy/information/reports, https://jrar.am/about/reports); for SGLMC, no information was provided to confirm compliance.

[14] ANPP - www.gnumner.am (not accessible); HVEN - www.gnumner.am (not accessible) and www.armeps.am; Yerevan TPP - http://ytpc.am/hy/information/2024-07-23-12-17-34; Jrar - https://jrar.am/announcements. "Investments and Grants" sub-section of the "Projects" section of the company's website (https://www.hven.am/en/cragrer/varker-ev-dramasnorhner).

Funded by
the European Union