

ACTIVITY REPORT OF
THE CHIEF OFFICIAL
ETHICS COMMISSION
FOR 2025

Abbreviations of names and terms used in the report

LAP – Republic of Lithuania Law on Administrative Proceedings

Compliance Officer – the person designated within an institution or body as responsible for the supervision and control of the area of conflict of interest

COEC – Chief Official Ethics Commission

DLA – declaration on lobbying activities

LLA – Republic of Lithuania Law on Lobbying Activities

CCST – Code of Conduct for State Politicians of the Republic of Lithuania

PINREG – Register of Private Interests

SKAIDRIS – information system for transparent legislative processes

LAPPI – Republic of Lithuania Law on the Adjustment of Public and Private Interests

LCOEC – Republic of Lithuania Law on the Chief Official Ethics Commission

EC – Ethics Commission of the Municipal Council

1. About the COEC

The Chief Official Ethics Commission (hereinafter referred to as the “COEC”, “Commission”) is a collegial institution established by and accountable to the Seimas of the Republic of Lithuania. Its main purpose is to ensure that government institutions and persons working in them operate with integrity and that decisions taken are based on high standards of transparency and accountability.

The activities of the COEC include assisting persons declaring private interests, monitoring and controlling compliance with the DPA, overseeing lobbying activities and monitoring the behaviour of politicians. The COEC is served by a Secretariat composed of civil servants and employees working under employment contracts (hereinafter referred to as the “employees of the ‘Secretariat’”).

1.1. Number of persons and organisations served by the COEC

Legal act	Number of persons	Number of organisations
Law on Lobbying Activities	– 394 lobbyists * – approximately 30,000 persons who may be influenced	– approximately 4,000 public sector entities
Law on the Adjustment of Public and Private Interests	– more than 160,000 declarants	– approximately 4,000 public sector entities
Code of Conduct for Politicians	– approximately 1,500 members of municipal councils	– 60 municipal ethics commissions

* According to data available on 31 December 2025.

Thus, the functions of the COEC directly or indirectly involve the consistent oversight of the activities of tens of thousands of public sector servants, employees, politicians, officials, lobbyists and other stakeholders. This requires knowledge of the relevant legislation and the maintenance of the efficient administration system.

1.2. Overview of the situation from 2016 to the present

In order to ensure adequate funding for all its functions, since 2016 the Commission has been regularly applied to the Board of the Seimas of the Republic of Lithuania, the Committee on State Administration and Local Authorities, the Government of the Republic of Lithuania and the Ministry of Finance for the allocation of additional funding because:

- the number of civil servants and employees at the COEC has remained unchanged since 2016;
- in 2016 and 2021, the Board of the Seimas increased the number of posts by 8 posts, but no funding was allocated for them;
- in 2020, the Seimas assigned additional functions to the COEC (the new Law on Lobbying of the Republic of Lithuania, preliminary dispute resolution (formerly, a judicial function), etc.), but no funding was allocated for their implementation – the Commission must fulfil all additional functions with the same level of human resources from 2016;
- from 2021, the COEC has been administering (continuously monitoring and improving) new IT systems (PINREG, SKAIDRIS);

- currently, only the basic functions of the COEC are ensured (performance evaluations are being conducted, responses to requests are being provided), while proactive prevention activities are very limited;
- the remuneration is allocated to only for performance of the main functions.

1.3. Insufficient funding limits the capacity to monitor corruption risks

Undeclared conflicts of interest. Due to lack of resources, the COEC is unable to effectively monitor all persons subject to the requirements of the LAPPI. In addition, the Commission faces challenges in implementing the recommendations of the Council of Europe’s Group of States against Corruption (GRECO) and the Organisation for Economic Co-operation and Development (OECD) on the prevention and management of conflicts of interest, ensuring cooling-off periods, etc.

Abuse of office. The COEC does not have sufficient human resources to carry out prevention activities, which severely limits its ability to prevent cases of abuse of office in advance.

2. Net Promoter Score (NPS)

Since 2023, the COEC has been evaluating its activities using the Net Promoter Score (NPS). This tool makes it possible to monitor and effectively assess the quality of the services provided by the COEC and the satisfaction of the entities it serves.

The table below shows the number of respondents who participated in the surveys:

Respondent group	2023	2024	2025
Managers	446	328	398
Compliance Officers	171	104	301
Declarants	329	1,291	447

The number of respondents fluctuated between 2023 and 2025. In 2023, 946 persons were surveyed, in 2024 – 1,723 persons were surveyed, and in 2025 – 1,146 persons were surveyed. A larger sample allows for more accurate identification of differences in the assessments of managers, Compliance Officers and declarants.

This performance assessment is important as:

Customer satisfaction measure. The NPS reflects the extent to which civil servants, officials, employees, users of public sector services or other stakeholders are satisfied with the services provided by the COEC. A high NPS indicates that customers are satisfied and willing to recommend the services of the COEC to others.

Loyalty and recommendation indication. The assessment of the respondents’ answers distinguishes between “fans” (9-10 points) and “detractors” (0-6 points). The afore-mentioned methodology allows not only to assess the current satisfaction, but also to predict customer loyalty and the impact of service development. Most positive customers can help build your organisation’s reputation.

Performance indicator. The NPS captures customer experience and loyalty, thus, becomes one of the key indicators for measuring performance. The results clearly show the organisation's strengths and areas for improvement and enable targeted adjustments to be made.

2.1. Summary of the Net Promoter Score (NPS) in 2025

The survey results revealed that trust in the COEC remains high among different target groups. The institution is most trusted by Compliance Officers – 7 out of 10 Compliance Officers indicated that they trust the COEC (9 or 10 points out of 10 points). Approximately a half (49%) of managers trust the COEC. Nearly a third (29%) of those who declare private interests trust the COEC, while 34% of them do not trust the COEC.

Over the course of the year, trust in the COEC declined among managers (58% → 49%) and persons declaring interests (35% → 29%). The level of trust among Compliance Officers remained stable. Overall trust in the COEC increased at the expense of neutral assessments.

In the group of managers, although the numerical value decreased, the managers of budgetary institutions trust the COEC the most (the average score is 8.1 out of 10; previously it was 8.7). The institution is not trusted by the managers of public institutions (the average score is 7.2). The latter rating also decreased as compared to the previous period. However, state politicians have a more favourable opinion of the COEC (the average trust rating increased from 7.3 to 7.9).

The majority of respondents disagree with the statement that the COEC is a punitive institution. The ratings in the target groups remain similar to those of the previous year.

Compliance Officers are most likely to agree that the COEC helps to manage conflicts of interest or resolve other conflict of interest situations (50%). Neutral and negative assessments make up the majority in the groups of managers and declarants. As compared to the last year's results, the assessment of managers has decreased (from an average of 7.3 to 6.6 out of 10), especially in the groups of budgetary and public institutions.

Slightly more than a third (35%) of Compliance Officers agree that the COEC helps identify risks related to conflicts of interest, representation, acceptance of gifts, cooling-off periods and other restrictions. The rating remained similar over the year, although there was a slight decrease in the proportion of high ratings and an increase in the proportion of neutral ratings.

When seeking advice on conflict of interest management, managers would most often choose the COEC. This is more common among managers of budgetary institutions and state or municipal enterprises. Over the year, there was an increase in the number of those who would choose independent lawyers or experts in second place, and a decrease in those who would choose them in third place. This change was observed among managers of public institutions.

77% of Compliance Officers and about a quarter (27%) of respondents said they were aware of the distance learning courses organised by the COEC. About a third (32%) of Compliance Officers and 14% of respondents use them frequently. Over the course of the year, both awareness of remote training and its frequent use decreased among Compliance Officers.

The COEC compliance tests are known to about a half of Compliance Officers (53%) and one-fifth of managers (20%). A half of Compliance Officers (51%) and one-third of managers (32%) consider them useful.

Approximately one-third of Compliance Officers (34% chose 9 or 10 out of 10) frequently use the COEC opinions and explanations published on the website. Their average use has decreased over the year (7.9 → 6.7 out of 10).

The assessment of the PINREG system, although slightly lower than in 2024, remains stable – **the majority of Compliance Officers (66%) agree that the system is convenient for declaring private interests**. This year, fewer Compliance Officers rated the system as convenient, but the proportion of respondents using this function also decreased. The rating remains stable among those who declare private interests, although the proportion of those who find the system complicated increased from 22% to 27%.

Telephone consultations are rated highly, especially among Compliance Officers. Average ratings among Compliance Officers remained high, while they slightly decreased among those declaring interests.

The average rating of enquiries submitted by e-mail or in writing among Compliance Officers shows an improving trend. Ratings among declarants are lower. However, this may be due to the small number of people who submitted such enquiries.

3. Overview and key findings of the investigations carried out by the COEC in 2025

Below is presented statistics relating to investigations by the Chief Official Ethics Commission into possible infringements for the period 2020–2025.

3.1. Law on the Adjustment of Public and Private Interests of the Republic of Lithuania (LAPPI)

Indicator	2020	2021	2022	2023	2024	2025
Number of reports received	338	358	24	247	215	294
Preliminary investigations on the LAPPI	102	118	97	36	54	52
Calls for submission, revision or completion of a declaration	90	78	54	24	24	23
Number of investigations carried out	119	71	55	24	28	23
Infringements established	76	44	35	19	25	18
No infringement found or investigation terminations	43	27	20	5	3	5
Number of decisions appealed against to the courts	16	8	7	7	3	1
- heard in court, judgments have become final	16	8	7	7	2	1
- of which unfavourable decisions adopted by the COEC	2 in full and 2 in part unfavourable	1 in full and 1 in part unfavourable	1	2	0	0

Key conclusions:

- Individuals are more diligent in complying with the obligation to declare their private interests as established by the LAPPI. This is also evidenced by the decreasing number of reminders sent by the COEC.
- As every year, in 2025, the COEC conducted most of its investigations into possible conflicts of interest – 11 infringements. Two persons of the afore-mentioned persons were found to have grossly violated the provisions of the LAPPI by pursuing their private interests. The number of investigations into violations of the provisions of the LAPPI prohibiting the use of official duties and official status, as well as state or municipal property, for non-official activities is increasing. In 2025, seven such decisions were taken (six violations were established). Two investigations were conducted into restrictions on employment.
- Due to a lack of human resources, the COEC forwarded more than 30 reports containing substantiated information about non-compliance with the provisions of the LAPPI to the heads of institutions or agencies or ethics commissions of the municipal council for examination and investigation (regarding the assessment of the conduct of the members of municipal council).
- As in 2024, during the reporting period, the COEC found two persons to have committed gross violations of the provisions of the LAPPI. In 2025, all four persons were fined for the afore-mentioned administrative offence.

3.2. Law on Lobbying Activities of the Republic of Lithuania (LLA)

Indicator	2021	2022	20	20	2025
Number of reports received	25	15	21	17	19
Preliminary investigations into the LLA	–	–	–	6	8
Number of investigations carried out	20	6	6	2	13
– Infringements regarding undeclared lobbying activities of a lobbyist found by the COEC	1	0	1	0	0
– Infringements regarding lobbying activities of persons not included in the list of lobbyists found by the COEC	11	2	3	2	11
Number of decisions appealed against to the courts	5	1	0	1	3
– heard in court, judgments have become final	5	1	0	1	0
– including unfavourable decisions adopted by the COEC	2	0	0	0	0

Key findings:

- The number of reports received was similar to the previous year, but most of them were justified, i.e. they provided grounds for initiating investigations into possible infringements of the Law on LLA.

- All investigations were conducted by the COEC into possible illegal lobbying activities carried out by persons not included in the list of lobbyists. Only in two cases no infringements of the LLA were found. Five investigations were initiated by the COEC on its own initiative.
- Having examined the applicant's complaint, the Supreme Administrative Court of Lithuania (SACL) upheld the decision taken by the COEC in 2024. In 2025, three complaints were lodged against decisions taken by the COEC, which have not yet been examined.

3.3. Preliminary dispute resolution (regarding decisions of ethics commissions of the municipal councils)

Indicator	2020	20	2	20	2024	2025
Number of complaints received by the COEC	21	56	24	17	43	63
– Submitted by the applicant (citizen, politician, journalist) regarding an EC decision	12	30	13	8	21	48
– Provided by the subject of the investigation (politician) who has been found by the EC in infringement	9	26	11	9	2	15
Number of refused complaints	6	13	14	8	20	7
Number of cases examined	12	40	12	8	2	50 (8 carried over to 2026)
– the COEC upheld the complaint and annulled an EC decision	6	21	7	8	19	12

Key findings:

- There has been a significant increase in the number of complaints received and cases examined.
- There has been a decrease in procedural violations in the decisions of ethics commissions of the municipal councils appealed against to the Commission.
- The main reasons for the COEC's decision to annul the decisions of ethics commissions of the municipal councils are as follows: the person under investigation does not exercise their right to defence because the subject of the investigation against them is not properly formulated, and the decisions are not motivated and not based on objective data (facts).

In 2025, the number of preliminary dispute resolution (PDR) cases significantly increased: 63 complaints were received, only 7 of which were not accepted for consideration. As compared to 2024, the number of cases examined more than doubled. The above change was prompted by a ruling issued by the Supreme Administrative Court of Lithuania on 15 January 2025. Until then, the COEC had taken the position that complaints about a decision by the relevant authority not to initiate an investigation into a person's conduct did not fall within the competence of the COEC and should be submitted to the court. However, with the afore-mentioned ruling, the Supreme Administrative Court of Lithuania established a practice whereby complaints must be submitted to the COEC for mandatory preliminary dispute resolution

even in cases where the EC decides not to initiate an investigation. This is the main reason for the systematic increase in the number of PDR complaints examined by the COEC.

3.4. Investigations conducted by other institutions and bodies

Below is provided information on the carried out investigations into possible violations of the provisions of the LAPPI and Code of Conduct for State Politicians (CCST). The afore-mentioned information may be useful to understand who is responsible for conducting the investigations, what the results of the investigations are and how they are assessed by the Chief Official Ethics Commission itself.

Who carries out the investigations?

- **The institution or body where the person works.** If the person complained against is employed by an institution, that institution must conduct an investigation into the possible misconduct or breach of professional duties, or (depending on the status of the person) conduct the investigation in accordance with the provisions of Section 4 of the LCOEC by itself.
- **The higher authority supervising the institution.** If the person complained against is the head of the institution, the investigation shall be carried out by the entity that recruited or appointed the head of the institution, or by a collegiate body of the State or municipalities.
- **The ethics commissions of the municipal councils** assess the official conduct of municipal mayors and members of the municipal council in accordance with the provisions of the LAPPI and CCST.

What else is important to know about investigations?

If the investigation material shows that a civil servant or employee has violated the provisions of the LAPPI, the act may be considered as misconduct in office (for civil servants) or misconduct in employment (for employees working under employment contract). Investigations into misconduct in public office or employment are carried out in accordance with the relevant legislation and decisions are taken by the institutions or bodies themselves.

Submission of decisions to the COEC

Within 5 working days of the decision being taken, the institution must submit the decision and all the investigation materials to the COEC.

If an investigation into misconduct in office (or a breach of official duties) reveals a breach of the LAPPI, the adopted decision is sent to the COEC for prevention of corruption. In this case, the material from the investigation shall not be assessed by the COEC.

The COEC also does not evaluate decisions submitted by ethics commissions of the municipal councils following investigations into the compliance of state politicians' conduct with the provisions of the CCST. The COEC has a duty to assess the validity and legality of such an investigation upon receipt of a complaint in accordance with the mandatory pre-trial dispute resolution procedure.

Data on investigations conducted by ethics commissions of the municipal councils in 2025

In 2025, the COEC received information on the results of 52 investigations conducted by ethics commissions of the municipal councils. Most of the investigations (38) were conducted into possible violations of the CCST, including 24 cases which were found to be violations.

The ethics commissions of the municipal councils submitted 21 decisions to the COEC for assessment, which (did not) recognise violations of the provisions of the LAPPI by state politicians. Having doubts as to the application of the provisions of the LAPPI in 5 decisions, the Commission decided to conduct its own investigations. In three other cases, the COEC decided not to evaluate the submitted decisions because complaints had been received from the PDR within the time limit set by the LCOEC. The COEC accepted these complaints. After examining them, the COEC decided to annul the decisions of two ethics commissions of the municipal councils and rejected one complaint as unfounded.

3.5. Main conclusions of the investigations

- **LAPPI investigations.** There has been an increase in reports regarding the assessment of compliance with the provisions of the LAPPI by persons. The majority of investigations carried out by the COEC relate to violations of the duty to avoid conflicts of interest. Unfortunately, having identified reasonable information about non-compliance with the provisions of the LAPPI, the COEC forwarded more than 30 reports to other entities for investigation and decision-making due to a lack of human resources.
- **LLA investigations.** Although the number of reports of possible violations remained similar, the number of investigations conducted by the COEC was significantly higher. In addition, the COEC initiated five investigations into possible violations of the LLA on its own initiative, after reviewing the information provided in the report and the explanations provided by the entity under investigation.
- **Preliminary dispute resolution (PDR).** Although complaints about decisions taken by ethics commissions of the municipal councils increased by almost a third, the number of cases examined more than doubled. The above situation was largely due to a decision adopted by the Supreme Administrative Court of Lithuania at the beginning of the reporting year, in which the Court ruled that a decision by an ethics commission of the municipal council not to initiate an investigation must first be examined under the mandatory preliminary dispute resolution procedure by submitting a complaint to the COEC.

Summary

According to the statistics for 2025, there has been a significant increase in the number of reports of violations of the LAPPI, the LLA and the CCST and complaints submitted to the COEC as a mandatory preliminary dispute resolution body. Approximately 80% of the initiated and completed investigations confirm that an infringement has occurred.

In 2025, the COEC faced an exceptionally heavy workload, which was increased by repeated and often identical complaints about decisions taken by ethics commissions of municipal councils (PDR complaints). First, due to investigations not initiated by the EC, and later, when one of the parties to the dispute disagreed with the decisions taken by the EC, the COEC re-examined the dispute. For example, after upholding one applicant's complaint about six investigations not initiated by the EC, the COEC subsequently examined six separate cases based on the six submitted complaints. Moreover, in this particular case, it is likely that the cases would have been examined for a third time, but due to the expiry of the one-year limitation period set by the CCST for assessing the conduct of a state politician, the COEC was no longer able to instruct the EC to conduct the investigations again. It should be emphasised that the process lasted almost ten months from the first complaint in February 2025 to the examination of the last case in November (COEC had to carry out the same type of analysis twice, but at a different procedural

level). This clearly illustrates both the scope of the work and the complexity of the procedures, as well as the human resources and time costs involved.

After examining 19 complaints about decisions made by the COEC over the past four years, the court ruled against the COEC in only three cases.

Lack of resources. Due to critically insufficient human resources and the growing number of reports of violations and PDR cases, the COEC will be forced to increasingly refer reports to other entities for examination. In addition, the deadlines for the majority of the investigations have to be extended.

4. Prevention and compliance

4.1. Consultation and recommendations

During the reporting year, ongoing consultations continued with heads of institutions, their representatives (Compliance Officers) and persons declaring private interests or other interested parties on issues relevant to them concerning the implementation of the provisions of the LAPPI, the LLA and the CCST. The Commission's opinion was provided through direct communication by telephone or by promptly responding to inquiries received by e-mail.

Indicator	2021	2022	20	20	2025
Consulting, opinions and recommendations	498	525	605	772	924

During the reporting period, the COEC sought to respond effectively to the growing demand for consultations and recommendations. Therefore, the majority of the enquiries received by e-mail and not signed with a qualified signature were answered by applying the existing similar practice of the COEC. The COEC employees responded to enquiries by providing the COEC's opinion formulated in a similar situation. During the reporting year, most inquiries were received and answered by e-mail within 1-3 working days. This means that interested parties receive immediate expert assistance on any issue of concern to them.

Data on recommendations made in 2025

Indicator	2025
Official opinions of the Commission	144
Opinions/recommendations submitted by employees by e-mail	268
Consultations provided by employees by e-mail on the declaration of private interests and the implementation of PINREG functionalities	51

4.2. Coordination of positions

During the reporting year, job descriptions provided by institutions were analysed for inclusion in the list of persons declaring private interests. The COEC assessed whether the functions specified in the descriptions met the requirements of Article 4(3)(13) of the LAPPI and coordinated **412 positions submitted by 38 institutions**. On the initiative of the heads of institutions, these positions were included in the lists of persons declaring private interests.

Indicator	2023	2024	2025
Agreed positions	338	234	412

The growing number of persons making declarations shows that organisation leaders are becoming more aware and responsible, promoting a culture of transparency. Public sector employees whose duties are related to the management of state or municipal budget funds, asset administration, decision-making and the provision of public services are increasingly being included in the lists of declarants on the initiative of their managers. This step contributes significantly to the implementation of higher standards of transparency and strengthens public confidence in public sector institutions.

4.3. The COEC training: a strategic shift from face-to-face (via *Microsoft Teams*) to 24/7 remote e-training

Below are discussed the changes in the training of the COEC during the period from 2021 to 2025. The most significant change is the launch of distance e-learning on the PINREG platform from 2025.

4.3.1. Live training (via the *Microsoft Teams* app)

Training takes place live, i.e. at a set time using *Microsoft Teams* or another application. It has been noted that individuals who have completed remote e-training seek to deepen their knowledge in the areas of interest reconciliation and lobbying by participating in live training. This training is intended for civil servants and employees who are interested in the topics of interest reconciliation and lobbying and seek to better understand the basic principles of transparency, their practical application and importance in the activities of an organisation. Although there is a constant demand for live training, due to limited human resources, the COEC is currently unable to allocate more resources to organising such training.

Training programme	2021	2022	20	20	2025	Total
Training on adjustment of interests through <i>Microsoft Teams</i>	4,130	1,420	152	1,125	291	7,118
Lobbying training through <i>Microsoft Teams</i>	2,023	1,300	131	0	40	3494
Total number of participants:	6,153	2,720	283	1,125	331	10,612

4.3.2. Specialised seminars

In 2025, the COEC organised twelve specialised seminars, i.e. **Transparency Breakfasts**, where compliance officers openly discussed and sought the best solutions for ensuring transparency in the public sector:

- Much attention was paid to one of the most effective tools for preventing conflicts of interest, i.e. advance written recommendations. The legal status and content of such recommendations were discussed, as well as the specific cases in which such a document is submitted and the data on which it should be based.
- During the meetings, Compliance Officers raised questions of concern to them regarding the declaration of private interests, the use of PINREG functionalities, the management of conflicts of interest and the implementation of restrictions after the end of service.

4.3.3. Remote e-learning (24/7)

- **Large audience.** There are more than 160,000 declarants in Lithuania, so face-to-face training is no longer sufficient, and it is extremely difficult to organise training for such a large audience due to lack of time and human resources. E-learning allows to reach all participants, regardless of time and place.
- **Knowledge testing and individual assessment.** Using knowledge tests, the COEC can more accurately identify each participant's abilities, strengths and weaknesses, taking into account their level of knowledge, and tailor the training programmes accordingly.
- **Convenient management and reporting.** Reporting systems integrated in the electronic training platform (PINREG) show the progress of training in real time. This allows Compliance Officers and managers to monitor the learning process and identify knowledge gaps.
- **Limited resources of the COEC.** Although the number of employees at the COEC is small (26), the launch of e-training allows to reach a much wider audience without additional investment in employees.
- **Although there are other similar training courses in Lithuania,** they do not meet the latest requirements of the COEC's practices.

E-learning is organised on a 24/7 basis and currently participants can access the PINREG at any time.

Training programme	2021–2023	2024 completed training	Persons invited in 2024	2025 training completed	Persons invited in 2025
Declaration of private interests	0	8,227	23,140	855	2,177
Lobbying activities	0	1,602	4,181	4,496	13,214
Identification and management of conflicts of interest	0	519	1,365	9,445	25,295

Restrictions at the end of service	0	31	439	6155	1604
Investigation into the compliance of the declarant's conduct with the provisions of the Law on the Adjustment of Public and Private Interests of the Republic of Lithuania, teaching material	0	0	0	817	283
Procedures for investigating the conduct of a state politician that may not comply with the provisions of the Code of Conduct for State Politicians of the Republic of Lithuania	0	0	0	38	154
Total (distance 24/7)	0	10,379	29,125	28,651	76,328

Key conclusions:

In 2025, distance e-learning continued on a 24/7 basis, maintaining the structure and content of the training programmes of previous years. There was a significant increase in the number of participants in all training programmes. By the end of 2025, 28,651 persons had completed the training, with a total of 76,328 persons invited to participate. This shows a steady increase in the involvement of institutions and employees and the relevance of the training.

The highest number of learners was observed in the training programmes “Identification and Management of Conflicts of Interest” and “Declaration of Private Interests”, which remain the most relevant for public sector employees.

It should be noted that in 2025, two new training programmes were launched for persons conducting investigations:

- “Training material for investigating the compliance of the conduct of the declarants with the provisions of the Law on the Adjustment of Public and Private Interests of the Republic of Lithuania”;
- “Procedures for investigating the conduct of state politicians that may not comply with the provisions of the Code of Conduct for State Politicians of the Republic of Lithuania”.

Although the above programmes were only implemented for part of the year, they attracted interest and supplemented the training offer, contributing to the strengthening of the competences of persons conducting investigations.

4.4. Self-assessment tests at the ethics level

In 2024, the COEC launched a new initiative by developing three compliance tests (questionnaires) for public sector organisations to assess their compliance with the provisions of the LAPPI and the LLA. The tests/questionnaires are tailored to different levels of responsibility and functions.

Why are compliance tests/questionnaires needed?

- **Ensuring transparency**

By monitoring the implementation of the LAPPI and the LLA, the COEC aims to help organisations identify and manage the risks of conflicts of interest, corruption or illegal lobbying in a timely manner.

- **Effective risk management**

According to international standards (e.g. ISO 31000), unmanaged risks can lead to financial losses, legal consequences and reputational damage.

- **Practical assistance**

Based on the answers to the tests/questionnaires, the COEC provides personalised recommendations on how to improve the procedures for declaring private interests, disqualification and disclosure of lobbying influence.

What tests/questionnaires have been developed?

- **General questionnaire for assessing the conformity of an organisation**

It consists of two parts: the first part is intended for assessing compliance with the provisions of the LAPPI, and the second part is for those organisations affected by the LLA.

- **Questionnaire for the Compliance Officer (authorised person)**

It helps to determine whether the Compliance Officer has sufficient authority, the right to prepare preliminary written recommendations, etc.

- **Questionnaire for the head of the organisation**

It focuses on strategic aspects: whether the organisation has a risk management system that covers the prevention of conflicts of public and private interests in place, whether the activities of senior managers are subject to risk assessment, etc.

How are tests/questionnaires applied?

- **Self-assessment**

Public sector organisations join the PINREG and take the the respective test/questionnaire.

- **Recommendations of the COEC**

Organisations that have completed the test/questionnaire see the results of their self-assessment (up to 100%). Based on the above, guidelines are immediately provided on how to improve declaration and/or

recusal procedures, as well as other specific measures to improve activities in areas where organisations experience difficulties in complying with the LAPPI and the LLA.

- **Continuous improvement**

Organisations that regularly carry out tests/questionnaires can monitor their progress in managing compliance risks.

Results of the initiative in 2025

In 2025, the COEC invited municipal administrations, institutions and companies providing services to residents to complete compliance tests. Invitations were sent to a total of 170 organisations.

The results showed that:

- risk management was best in municipal administrations;
- the weakest risk management was in public institutions;
- healthcare institutions pay too little attention to the prevention of illegal lobbying.

The following areas for improvement should be distinguished:

- Some conflict of interest management measures (e.g. recusal and prior recommendations) are not sufficiently well known and applied.
- When the head of an organisation recuses themselves, the COEC is not informed via the PINREG. The information is not published on the organisation's website.
- Persons working in the civil service are not familiarised with the restrictions on representation imposed on them.
- Organisations have not prepared and approved procedures for completing and submitting declarations of lobbying influence.
- The Compliance Officer, as the representative of the organisation, is not granted the right to access the PINREG. His functions are not specified in the job description.

	Name of the test	Sent to	Answered by	Percentage of organisations with a score of 80% or more	Percentage of organisations with a score between 50% and 80%	Percentage of organisations with a score of less than 50%
Budgetary institutions (municipal administrations)	General questions of conformity of the organisation for self-assessment, Part I (LAPPI)	60	53	54.72	45.28	0.00

Budgetary institutions (municipal administrations)	General questions of conformity of the organisation for self-assessment, Part II (LLA)	60	52	69.23	15.38	15.38
Budgetary institutions (municipal administrations)	Questions to the Compliance Officer	60	53	54.72	35.85	9.43
Budgetary institutions (municipal administrations)	Questions to the head of the organisation	60	48	58.33	39.58	2.08
Budgetary institutions (gymnasiums)	General questions of conformity of the organisation for self-assessment, Part I (LAPPI)	40	18	27.78	55.56	16.67
Budgetary institutions (gymnasiums)	General questions of conformity of the organisation for self-assessment, Part II (LLA)	40	18	27.78	33.33	38.89
Budgetary institutions (gymnasiums)	Questions to the Compliance Officer	40	14	42.86	28.57	28.57
Budgetary institutions (gymnasiums)	Questions to the head of the organisation	40	18	83.33	16.67	0.00
Public institutions	General questions of conformity of the	30	22	22.73	59.09	18.18

	organisation for self-assessment, Part I (LAPPI)					
Public institutions	General questions of conformity of the organisation for self-assessment, Part II (LLA)	30	20	30.00	20.00	50.00
Public institutions	Questions to the Compliance Officer	30	21	23.81	52.38	23.81
Public institutions	Questions to the head of the organisation	30	20	60.00	25.00	15.00
AB (public limited liability companies) and UAB (private limited liability companies)	General questions of conformity of the organisation for self-assessment, Part I (LAPPI)	40	23	30.43	52.17	17.39
AB (public limited liability companies) and UAB (private limited liability companies)	Questions to the Compliance Officer	40	21	57.14	14.29	28.57
AB (public limited liability companies) and UAB (private limited liability companies)	Questions to the head of the organisation	40	24	62.50	33.33	4.17

4.5. Part of the internal control system

The controls (Section 6) of the LAPPI, which aim to prevent potential conflicts of interest in public sector organisations, are considered to be an integral part of the internal control system. This is particularly important in terms of the control environment and compliance with legislation. An excellent way to assess how specific organisations integrate conflict of interest risk management into their internal control systems is through the three lines of defence principle.

It is an integrated risk management system, with the first line (operational) covering the day-to-day activities of employees and managers, the second line (compliance, risk management functions) providing dedicated persons to monitor the risk of conflicts of interest and transparency of lobbying activities, and the third line (internal or external audit) providing an objective assessment of whether the first two lines are working effectively.

Below is an overview of how the risk of infringements of the LAPPI in the public sector can be assessed from the statistics recorded in PINREG.

First line: 4,000 organisations and 160,000 declarants

- In total, around 4,000 public sector entities are obliged to comply with the Law on the Adjustment of Public and Private Interests (LAPPI) and the Law on Lobbying Activities (LLA).
- Around 160,000 persons (civil servants and other persons required to declare private interests) are required to revise their declarations on time, recuse themselves in the event of a conflict of interest and avoid non-transparent lobbying influence.
- The first line needs clear information, simple procedures and internal pre-training.

Second line: lack of Compliance Officers and low activity

In public sector organisations, Compliance Officers (or other authorised persons) act as a second line of defence, overseeing the implementation of the provisions of the LAPPI and the LLA. However, the available data indicate some discrepancies:

1. Registration in the PINREG system

- Only 1,058 Compliance Officers (26%) from 4,000 organisations registered in the reporting year. As compared to 2024, when there were 1,000 registered Compliance Officers, this number has increased very slightly, only by 1.5%.
- Most organisations still do not have designated specialists capable of applying and monitoring conflict of interest management procedures.

2. Organisation of training

- **Only 5 Compliance Officers** out of approximately 1,000 registered Compliance Officers in 2024 independently created new distance training programmes in the PINREG system. **In 2025, there was greater activity**, with an additional **11 Compliance Officers** creating new training programmes.

- In 2024, **130** Compliance Officers assigned training (developed by themselves or by the COEC) to employees of their institutions. **In 2025, this indicator increased significantly – 363 cases of training assignment were recorded**, which indicates the increasing use of the functionality of the PINREG system.

3. Procedure for recusals and suspensions

- According to Article 11 of the LAPPI, any person making a declaration is obliged to recuse himself in the event of a conflict of interest. If necessary, the Compliance Officer shall organise a suspension procedure and, if applicable, notify the COEC via the PINREG.
- According to data for 2025, 101 Compliance Officers submitted notifications of recusal or suspension.

The following data on notifications (for the period 2024–2025) is provided below:

2024		2025	
Range of reports on recusals	Number of organisations	Interval between reports of recusals	Number of organisations
200	1	2	2
150	1	150–199	0
100–149	1	100–149	5
50–99	6	50–99	2
30–49	4	30–49	4
20–29	1	20–29	1
10–19	3	10–19	4
5–9	3	5–9	9
2	22	2–4	26
1	59	1	48

Formation of organisational structure in the PINREG

Despite the possibility of forming an organisational structure in the PINREG system, a relatively small proportion of Compliance Officers use this function. In 2024, 230 Compliance Officers formed an organisational structure, while in 2025, 254 organisational structures were formed. Thus, as compared to 2024, this number increased by only 9.4%.

In the absence of an organisational structure in the PINREG system, managers and Compliance Officers have fewer opportunities to make full use of the system's functionalities, which limits the effective implementation of conflict of interest monitoring, control and risk forecasting processes.

Implementation of the three criteria (organisational structure, recusals and suspensions, assignment of training)

41 organisations out of the approximately 4,000 organisations met all three criteria, i.e. the organisational structure formed in the PINREG system, training assigned to employees and data on recusals or disqualifications compiled in 2024, in 2025, 69 organisations met all three criteria.

The number of organisations that met at least two of the three criteria in the PINREG system reached 51 in 2024 and increased to 168 in 2025, which shows a positive trend in the afore-mentioned indicator.

Third line: poor capacity for independent audit

For the third line of internal (or external) audit to work, it is essential that the second line provides a proper foundation of data and procedures. According to the knowledge of the COEC, there are only fragmented initiatives to assess the effectiveness of the management of conflicts of interest (or to audit the risks of lobbying) in more detail.

As a result, the practical benefits of the third line are so far minimal and audit recommendations, if made, often remain unimplemented due to the limited capacity of the second line.

Increased effectiveness of the second and third lines of defence would lead to better prevention of conflicts of interest and transparency of lobbying activities in the public sector, thus, enhancing trust in public institutions.

4.6. Lobbying activities

Below is an overview of how lobbying statistics (number of natural and legal persons lobbying, number of declarations) as well as the broader legal and practical context have evolved over the period 2021–2025.

4.6.1. Statistics (2021–2025) and general trends

Indicator	2021	2022	20	20	2025
Natural persons on the list of lobbyists	36	14	19	9	19
Legal persons on the list of lobbyists	120	19	41	14	20
DLAs of lobbyists (declarations of legislative influence)	860	627	635	573	623
Episodes of lobbying activities (cross-declaration)	253	233	157	112	10
Active lobbyists (submitted at least one DLA)	90	83	82	77	88
Persons on the list of those influencing law-making	42	6	27	10	4

In 2020, there were a total of 122 lobbyists. In 2021, with 35 natural persons and 120 legal entities registered, there were 255 lobbyists operating in Lithuania (22 deregistered). In 2022, the number of lobbyists increased to 288 active lobbyists. In 2023, there were 164 natural persons and 184 legal entities on the list of lobbyists, in total – 348 lobbyists, and in 2024, there were 362 lobbyists. In 2025, there were 394 lobbyists on the list, including 181 natural persons and 213 legal entities.

The data shows a consistent increase in the number of lobbyists. The growth is particularly noticeable in the group of legal entities, with the total number of lobbyists in 2025 more than tripling as compared to 2020.

Accordingly, there has been a steady increase in the number of persons influencing law-making, from 42 legal entities in 2021 to 85 persons in 2025 (during the afore-mentioned period, 4 legal entities were removed from the list of persons influencing law-making).

4.6.2. When activities are considered as lobbying activities?

According to the LLA, lobbying activities are considered as purposeful influence on legislation where:

1. there is the relevant entity (a natural or legal person acting as a lobbyist or required to register as a lobbyist);
2. attempts are made to amend, adopt or repeal a specific legal act;
3. a clear proposal (arguing why certain amendments should be made) is put forward;
4. there is an apparent aim of persuading a person to take a desired decision.

The law also establishes 12 exceptions (Article 7 of the Law on Lobbying). For example, media activities, participation of experts in working groups, public consultation in the TAIS system, petitions, etc.

4.6.3. General conclusions

Despite the improvement of the LLA from 2021 and the introduction of the system SKAIDRIS, some lobbying activities are still not declared or highly extensive exemptions are used.

Transparent lobbying can be seen as a positive element of the democratic process, but it is effective only when all participants, i.e. lobbyist and government representative, comply with the law.

4.7. Screening of persons, cooling-off period, declarations

4.7.1. Cooling-off period

Section 4 of the LAPPI provides for that persons may be subject to a cooling-off period after leaving the civil service.

For example, if a civil servant controlled some undertaking during his last year in office, he may not take up a position in that undertaking for one year after leaving his post. Similarly, during the afore-mentioned period, a former civil servant or employee who has ceased to be a civil servant may not, after

having ceased to be a civil servant, represent natural or legal persons in his former place of employment or in any institution to which his former place of employment belongs.

Is it an absolute ban?

No. The COEC may decide to grant an exemption or not in specific cases upon a request from a person. In deciding whether to grant an exemption, the documents, information about the former employee's duties, the scope of his liability, the legal form of the legal entity and the content of the adopted decisions are taken into account. Statistics on the restrictions applied under the LAPPI:

Restrictions under the LAPPI	2020	2021	2022	2023	2024	2025
Restriction on employment (Article 15)						
Number of requests received	3	1	6	11	10	15
Exemption granted by a decision of the COEC	0	1	3	8	7	11 (In 1 case, it was determined that the restriction did not apply)
Restrictions on representation (Article 17)						
Number of requests	0	0	1	0	1	2
Exemption granted by a decision of the COEC	0	0	1	0	0	0

Comment

More human resources are needed to enable the COEC to take decisions on the exemption (not to apply the cooling-off period). The Commission has to assess all decisions that have been directly drawn up, considered or adopted by a person in civil service position within one year. The number of decisions can be several dozens or even several hundred, and often corresponds to the scope of an investigation into a possible violation of the provisions of the LAPPI.

4.7.2. Screening of candidates to prevent corruption

According to the provisions of the Republic of Lithuania Law on Prevention of Corruption, the Special Investigation Service (SIS) and other authorised institutions have the right to collect information

on persons applying for civil sector positions. This information may be obtained from criminal intelligence entities, public registers and other sources, in order to assess the potential risk of corruption.

When collecting such information, the afore-mentioned institutions also contact the COEC regarding a person's previous violations related to the reconciliation of public and private interests, lobbying activities or violations of the provisions of the Code of Conduct for State Politicians, thus, ensuring that a person's reliability is assessed before they are appointed to an important position.

Screening of persons	2020	2021	2022	2023	2024	2025	Total
Number of screened persons	2,650	3,125	3,947	5,214	5,876	5,942	26,754

According to the statistics, the number of persons screened between 2020 and 2025 has doubled, and over the past five years, the COEC has screened a total of over 26,000 persons who were subject to corruption prevention procedures. This shows that the importance of an impeccable reputation is increasingly valued in Lithuanian state policy. However, this process also requires considerable human resources and expertise from the COEC.

4.7.3. Discontinuation of public disclosure of declarations of private interests

According to the provisions of the LAPPI, declarants who cease to have this status (e.g. leave the civil service) may apply to the COEC to discontinue public disclosure of their declarations. The COEC may also terminate the public disclosure of the declaration on its own if it has reasonable grounds to believe that the person is no longer obliged to declare private interests.

This ensures that data on a person's declared duties or private interests that are no longer relevant are not made public when he is no longer bound by the obligation to declare.

4.7.4. Publication of declarations (statistics) is discontinued:

Discontinued publication of the PDI	2020	2021	20	20	20	2025	Total
Cases	974	4,035	2,125	3,517	4,801	4,091	19,543

In the last five years, the COEC has discontinued public declarations of private interests more than 19,000 times. This procedure requires careful administration because of the high turnover of declarants in the Lithuanian public sector (approximately 160,000 persons are required to declare private interests).

5. Cooperation

5.1. Conferences

In 2025, the COEC further intensified national cooperation and organised several major events and seminars aimed at strengthening compliance practices and improving conflict of interest management in the public sector.

5.1.1. Conference on public and private interests

At the conference “Public and private interest: what is it if not a conflict of interest”, heads of organisations, Compliance Officers and employees discussed the management of conflict of interest situations. The differences between probable and apparent conflicts of interest, the origin of private interest and the necessary causal links were discussed, based on the decisions of the Commission for the Prevention of Conflict of Interest in Public Service (the COEC) and case-law. The question was raised as to what determines a person’s choice to comply with the rules and whether a completely impartial decision is possible.

During the conference, Compliance Officers were presented with awards for their cooperation with the COEC, the dissemination of distance learning, the education of civil servants and their activity in the PINREG system.

5.1.2. Forum on lobbying activities

The Forum on Transparency in Lobbying emphasised the importance of transparent lobbying and sound legislative processes. Participants actively discussed how to ensure that legislation is adopted in a transparent and measured manner and that representatives of business, institutions and the public are involved in decision-making. The abundance of discussions showed that the topics of transparency and accountability remain highly relevant and that dialogue between interested parties must be further expanded.

During the forum, the COEC presented awards “For More Transparent Lobbying” to lobbyists and Compliance Officers who have distinguished themselves through active disclosure of lobbying activities, interest in the implementation of legislation and initiatives to strengthen transparent lobbying.

5.2. Membership in international organisations

In 2025, the COEC actively participated in the activities of international organisations in order to strengthen its competence and share its accumulated experience.

On 26-28 March, the representatives of the COEC participated in the Global Forum on Anti-Bribery and Integrity of the Organisation for Economic Co-operation and Development (OECD) and the OECD Meeting of Lobbying Regulators. The forums discussed trends and challenges in the fight against corruption, integrity and transparent regulation of lobbying, and presented the updated recommendations on lobbying and influence on law-making prepared by the OECD.

On 13-14 November, the representatives of the COEC also participated in a meeting of public sector transparency experts, which discussed the OECD’s *Integrity Outlook 2026*. This review assesses the progress made by countries, provides recommendations and emphasises the importance of strengthening transparency and resilience to corruption. The COEC presented Lithuania’s experience in creating a network of Compliance Officers – a model for the exchange of good practices and national coordination that has received positive international recognition.

The COEC also participated in the activities of various international networks: the European Network of Public Ethics (ENPE), the EPAC/EACN and the European Lobbying Regulation Network. At the meetings, representatives of the countries shared their practices on the administration of lobbyist registers, control of conflicts of interest and measures to strengthen transparency.

On 16-17 October, at the ENPE annual conference, the representatives of the COEC discussed strengthening the monitoring of conflicts of interest, technological solutions in the areas of declarations and control, and improving communication in order to achieve greater transparency in the public sector.
