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Third Evaluation Round

Addendum to the Second Compliance Report on Italy

"Incriminations (ETS 173 and 191, GPC 2)"

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"Transparency of Party Funding"

Adopted by GRECO
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I. INTRODUCTION

1. This Addendum assesses the additional measures taken by the authorities of Italy, since the adoption of the Second Compliance Report, to implement the recommendations issued by GRECO in its Third Round Evaluation Report on Italy. The Third Evaluation Round covers two distinct themes, namely:

   - **Theme I – Incriminations:** Articles 1a and 1b, 2-12, 15-17, 19 paragraph 1 of the Criminal Law Convention on Corruption ETS 173), Articles 1-6 of its Additional Protocol (ETS 191) and Guiding Principle 2 (criminalisation of corruption).

   - **Theme II – Transparency of party funding:** Articles 8, 11, 12, 13b, 14 and 16 of Recommendation Rec(2003)4 on Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns, and - more generally - Guiding Principle 15 (financing of political parties and election campaigns).

2. GRECO adopted the Third Round Evaluation Report on Italy at its 54th Plenary Meeting (20-23 March 2012) and made it public on 11 April 2012, following authorisation by Italy (Greco Eval III Rep (2011) 7E, Theme I and Theme II).The Third Round Compliance Report was adopted by GRECO at its 64th Plenary Meeting (16-20 June 2014) and made public on 20 June 2014, following authorisation by Italy (Greco RC-III (2014) 9E). The Second Compliance Report was adopted by GRECO at its 74th Plenary Meeting (28 November-2 December 2016) and made public on 2 December 2016, following authorisation by Italy. It was concluded that Italy had implemented satisfactorily or dealt with in a satisfactory manner eight of the sixteen recommendations contained in the Third Round Evaluation Report: seven recommendations had been partly implemented and one had not been implemented.

3. In view of the fact that eight recommendations had not yet been fully implemented, GRECO in accordance with Rule 31, paragraph 9 of its Rules of Procedure asked the Head of the Italian delegation to submit additional information regarding the implementation of recommendations i-iv, v and ix on Theme I – Incriminations, and recommendations iv and vi on Theme II – Transparency of Party Funding by 30 September 2017. A Situation Report was submitted by the authorities on 1 February 2018 and served as a basis for the present Addendum to the Second Compliance Report.

4. GRECO selected Austria and Montenegro to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Christian MANQUET, Head of Department, Directorate for Penal Legislation, Ministry of Justice (Austria) and Mr Dušan DRAKIC, Head of Section, Agency for Prevention of Corruption (Montenegro). They were assisted by GRECO's Secretariat in drawing up this Addendum to the Second Compliance Report.

II. ANALYSIS

Theme I: Incriminations

5. It is recalled that GRECO in its Evaluation Report addressed 9 recommendations to Italy in respect of Theme I. In the compliance procedure, until the preparation of the present report, recommendations vi, vii and viii had been dealt with in a satisfactory manner; recommendations i, ii, iv, v and ix had been partly implemented; recommendation iii had not been implemented.

6. In addition to the updates provided below for those recommendations for which full implementation is still pending, the authorities wished to report to GRECO some additional improvements made in relation to the issue of statute of limitations (recommendation vii, assessed as dealt with in a satisfactory manner in the Second RC-III). More particularly, the authorities state that, with the adoption of Law 103 of 23 June 2017, a broad range of amendments were made to the Criminal Code, the Code of Criminal Procedure and the Penitentiary System. Two key changes were made in relation to corruption offences, notably by increasing limitation periods and by providing for additional grounds for suspension of the limitation period.

Recommendation i.

7. *GRECO recommended to proceed swiftly with the ratification of the Criminal Law Convention on Corruption (ETS 173) and its Additional Protocol (ETS 191).*

8. GRECO recalls that the Criminal Law Convention on Corruption (ETS 173) was officially ratified by Italy on 13 June 2013 and entered into force on 1 October 2013, making Italy the 45th Member to ratify it. Preparations for the ratification of the Additional Protocol to the Criminal Law Convention on Corruption were reportedly underway, and GRECO therefore considered that recommendation i had been partly implemented.

9. The authorities of Italy reiterate the information provided at the time of the previous compliance report: the Ministry of Foreign Affairs and the Ministry of Justice have sent a draft proposal to criminalise active and passive bribery of foreign arbitrators to the Government. This draft would reportedly pave the way for ratification of the Additional Protocol to the Criminal Law Convention on Corruption (ETS 191). The authorities underline that this process is on hold following the general elections which took place in March 2018 and the establishment thereafter of a new legislature.

10. GRECO regrets the lack of any tangible progress regarding the process of ratification of the Additional Protocol to the Criminal Convention on Corruption (ETS 191) and therefore concludes that recommendation i remains partly implemented.

Recommendation ii.

11. *GRECO recommended to enlarge the scope of application of the legislation concerning active and passive bribery to all foreign public officials, members of foreign public assemblies, officials of international organisations, members of international parliamentary assemblies as well as judges and officials of international courts, in order to fully comply with the requirements of Articles 5, 6, 9, 10 and 11 of the Criminal Law Convention on Corruption (ETS 173).*

12. GRECO recalls that the recommendation had been considered partly implemented. The legislation on active and passive bribery of foreign/international officials had been modified to cover officials and judges of the International Criminal Court (ICC), in addition to officials of EU institutions or EU member states, and other foreign officials when the offence occurred in the framework of an international business transaction (i.e. OECD requirement), who were already covered by the original law. GRECO had noted that officials of other international courts, foreign public officials, members of foreign public assemblies, and officials of any other international organisations or international parliamentary assemblies were still not encompassed in the

legislation, as required by the Criminal Law Convention and requested in the current recommendation.

13. The authorities refer to the information provided under recommendation i, i.e. that the Government has received draft legislation for consideration in order to meet the requirements of this recommendation.

14. GRECO notes that that no new development has been reported. Italy, when ratifying the Criminal Law Convention on 13 June 2013, also deposited with the instrument of ratification a reservation not to establish as a criminal offence under its domestic law the conduct of passive bribery of foreign public officials, as well as active and passive bribery of members of foreign public assemblies except for individuals of member states of the European Union. The reservation has an impact on Italy's conventional obligations as far as Articles 5 and 6 of the Criminal Law Convention on Corruption are concerned. Since Italy renewed its reservation in July 2017 and therefore is under an obligation to reconsider this reservation within three years (under Article 38 of ETS 173), GRECO does not request Italy to provide additional information in this respect. Nevertheless, in line with GRECO's well established practice in respect of member states having deposited reservations, it encourages the authorities to reconsider this matter.

15. However, GRECO's concerns remain as to the criminalisation of active bribery of foreign public officials (at present this category is only covered in the EU/OECD context), where no reservations are possible under Article 37 of the Criminal Law Convention. Likewise, GRECO notes that no reservations are possible in respect of Article 9 (bribery of officials of international organisations). Finally, Italy has not made reservations concerning Articles 10 and 11 (bribery of members of international parliamentary assemblies and bribery of judges and officials of international courts, respectively) of the Convention, despite the fact that its domestic legislation still limits the coverage of these offences to the EU/OECD context (as was the case at the time of adoption of the Evaluation Report) and now also to the ICC (as referred to above). Therefore, Italy is conventionally bound to adjust its legislation accordingly.

16. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iii.

17. *GRECO recommended to (i) enlarge the scope of application of the legislation concerning active and passive bribery of foreign jurors in order to fully comply with the requirements of Article 6 of the Additional Protocol to the Criminal Law Convention on Corruption (ETS 191); and (ii) criminalise active and passive bribery of domestic and foreign arbitrators.*

18. GRECO recalls that no progress had been reported by the Italian authorities in respect of this recommendation in the previous compliance reports, and therefore that it had been considered not implemented.

19. The authorities again refer to the information provided under recommendation i, i.e. that the Government has received draft legislation for consideration in order to meet the requirements of this recommendation.

20. GRECO regrets the lack of any progress regarding the criminalisation of bribery of jurors and arbitrators and concludes that recommendation iii has not been implemented.

Recommendation iv.

21. *GRECO recommended to criminalise bribery in the private sector in accordance with Articles 7 and 8 of the Criminal Law Convention on Corruption.*

22. GRECO welcomed, in the previous compliance report, the reported intention of the authorities to adopt a decree criminalising bribery in the private sector. Pending its adoption, recommendation iv was assessed as partly implemented.

23. The authorities now report that Legislative Decree No. 38/2017 implements the Council of the European Union Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector. Accordingly, amendments were made to Article 2635 of the Civil Code, as follows:

> ***Article 2635 Civil Code – Bribery in the private sector***
>
> *1. Unless the act constitutes a more serious offence, the directors, general managers, managers responsible for preparing corporate accounting documents, statutory auditors and liquidators of companies or private entities who, even through intermediaries, solicit or receive, for themselves or for anyone else, money or any other undue benefit, or accept the promise of such, in order to perform or omit to perform actions, in violation of their official duties or their duty of loyalty, shall receive a prison sentence of between 1 and 3 years. The same penalty shall apply if the act is committed by those in the organisational area of the company or private entity, who perform managerial functions other than those of the persons referred above.*
> *2. The prison sentence shall be up to 1 year and 6 months if the offence is committed by a person subject to the direction and supervision of one of the parties specified in paragraph 1.*
> *3. Anyone who, even via intermediaries, offers, promises or gives money or other undue benefits to the persons specified in paragraphs 1 and 2 above shall also receive the same sentence.*
> *4. The penalties established in the paragraphs above are doubled for companies listed on regulated markets in Italy or other European Union countries or widely circulated among the public pursuant to Article 116 of Legislative Decree 58 of 24 February 1998 as amended.*
> *5. The admissibility of prosecution is only possible upon individual complaint, unless the fact gives rise to distortion of competition in the acquisition of goods and services.*
> *6. Without prejudice to Article 2641, the measure of confiscation of equivalent value cannot be lower than the value of the benefits, given, promised or offered.*

24. In addition, Article 2635-bis of the Italian Civil Code establishes a new offence of instigation to corruption, both from the active and the passive side. The reform also extends liability for offences of bribery in the private sector to legal persons, other than companies (e.g. foundations, non-profit organisations, political parties, unions, associations, etc.). Corporate liability is however restricted to the offences of active bribery and active instigation.

25. The authorities further report that the system of sanctions for active bribery and active instigation has also been subject to significant review with a view to making it harsher. Monetary fines now reach a maximum of 900 000 EUR in case of active bribery and of more than 600 000 EUR in case of active instigation. Additional disqualification bans and prohibitions may apply, i.e. preclusion from operating their business, suspension or revocation of authorisations, licenses, or concessions used to commit the unlawful act, prohibition from entering into contracts with the public administration - unless done in order to obtain a public service - exclusion from benefits, loans, contributions, or subsidies and possible cancellation of those already granted, and prohibition from publicising goods or services.

26. GRECO takes note of the developments reported and welcomes the improvements made regarding the criminalisation of bribery in the private sector, notably, as to the coverage of the personal (perpetrators) and material scope (corrupt acts) of the offence, as well as the enhancement of the sanctioning regime. GRECO accepts the interpretation provided by the authority that the range of possible perpetrators now extends not only to managing/top functions, but also to other persons who have been delegated that type of function (Article 2635, paragraph 1, Civil Code), and more broadly to anyone working under the direction or supervision of those categories of persons (Article 2635, paragraph 2, Civil Code). While the "acceptance of an offer" is not explicitly listed in the elements of the offence of passive bribery in the private sector (but the "offering" itself is expressly covered in the offence of active bribery in the private sector), GRECO accepted in its previous conformity report (and in the light of the jurisprudence submitted by Italy at the time) that there is no substantial difference between the terms "offering" ("*offerta*") and "promising" ("*proposta*") in the linguistic and legal notion of those in Italy. The new formulation of the offence has also eliminated the requirement, in order for the offence to be punished, that the company had suffered a detriment.

27. GRECO regrets that the admissibility of prosecution is only possible upon individual complaint, unless the fact gives rise to distortion of competition in the acquisition of goods and services. This is not in line with the Convention, but Italy made a reservation in this respect at the time of ratification of the Convention. Since Italy renewed its reservation in July 2017 and therefore is under an obligation to reconsider this reservation within three years (under Article 38 of ETS 173), GRECO does not request Italy to provide additional information in this respect. Nevertheless, in line with GRECO's well established practice in respect of member states having deposited reservations, it encourages the authorities to reconsider this matter.

28. GRECO concludes that recommendation iv has been partly implemented.

Recommendation v.

29. *GRECO recommended to criminalise active and passive trading in influence in accordance with Article 12 of the Criminal Law Convention on Corruption (ETS 173).*

30. GRECO took the view that further adjustments were required to comply with the requirements of Article 12 of the Criminal Law Convention and therefore assessed recommendation v as partly implemented. More particularly, GRECO noted that Article 346bis CC requires that there is an existing relationship of influence between the peddler and the official, while the mere assertion to this end is sufficient under the Convention ("…*taking advantage of the existing relationship s/he has with a public official…*"). Article 346 CC, which covers cases in which the influence peddler only pretends to have an influence, does not cover the active side (i.e. the one who gives the advantage to the influence peddler). It follows that, the Italian law is still not in full conformity with the requirements of Article 12 of the Criminal Law Convention.

31. The Italian authorities do not add any new information to what was already assessed by GRECO in its previous conformity report, other than that it has renewed the reservations made in respect of Article 12 of the Criminal Law Convention on Corruption on trading in influence: firstly that it reserves the right not to establish as a criminal offence, under its domestic law, the conduct referred to in Article 12 of the Convention, except when committed in the context of an existing relationship between the influence peddler and the persons referred to in Articles 2 and 4 of the Convention and to remunerate the performance of a conduct contrary to the duties, service or the failure or delay of an act of service. Secondly, Italy has declared that it reserves the right not to

establish, as a criminal offence, the conduct of trading in influence defined in Article 12 of the Convention, in view of exerting an improper influence, as defined in the foresaid article, over the decision making of any person referred to in Articles 5, 6 and 9 to 11 of the Convention.

32. GRECO can only reiterate the remarks made in the previous compliance report as to outstanding legislative gaps in the criminalisation of trading in influence (see paragraph 30) and, in the absence of any new development in this area, concludes that recommendation v remains partly implemented.

Recommendation ix.

33. *GRECO recommended (i) to abolish the condition, where applicable, that the prosecution of acts of corruption committed abroad must be preceded by a request from the Minister of Justice or a victim's complaint; (ii) to extend jurisdiction over acts of corruption committed abroad by foreigners, but involving officials of international organisations, members of international parliamentary assemblies and officials of international courts who are, at the same time, nationals of Italy.*

34. GRECO noted that, following the adoption of Laws 190/2012 and 69/2015 and given the broad interpretation of the term "abroad", the Minister of Justice's request to prosecute acts of corruption committed abroad is in practice very rarely needed. GRECO however warned of risks of political interference in those cases when the request or the victim's complaint is needed; an obstacle which is not foreseen in the Criminal Law Convention. GRECO also regretted that no measures had been taken to comply with the second part of the recommendation. The recommendation was considered partly implemented.

35. The authorities highlight that the cases in which a Minister's request is needed have been further limited due to the fact that corruption related sanctions have been increased; hence, at present this request is only necessary in relation to the offences of trading in influence and bribery for the performance of acts related to office (i.e. offences with sanctions punished with less than four years' imprisonment). The authorities further recall that, as evidenced by practice, in the few cases where the need for the Minister's request arose, the latter has never refused to do so. The authorities also add that the interpretation of the Italian courts of territorial jurisdiction is very wide, meaning that it is enough that the planning of the act of corruption begins on Italian soil in order to prosecute such illegal acts committed in Italy and not abroad. As to the second part of the recommendation, no new legislative developments can be reported.

36. GRECO takes note of the information provided by the Italian authorities and again welcomes the fact that Italy assumes broad jurisdiction for offences committed outside its territory. While GRECO notes that the need for the Minister of Justice's request to prosecute acts of corruption committed abroad is very rarely needed (and regarding corruption offences only in relation to the offences of trading in influence and bribery for the performance of acts related to office) and has never occurred in practice, the Criminal Law Convention on Corruption does not contemplate such a requirement. GRECO cannot therefore depart from its viewpoint in this respect, given the potential risk of political influence that this additional requirement may bear in such cases. GRECO looks forward to receiving further information regarding this particular issue in recommendation ix(i).

37. Nothing has been reported regarding the second part of the recommendation, but GRECO notes that Italy, when ratifying the Criminal Law Convention on 13 June 2013, also deposited with the

instrument of ratification a declaration that it will apply without restriction the rules of jurisdiction defined in Article 17, paragraphs 1b and c of the Convention, under the conditions currently provided for in articles 9 and 10 of the Italian Penal Code. This declaration has therefore an impact on Italy's conventional obligations in this area. Since Italy renewed its declaration in July 2017 and therefore is under an obligation to reconsider this declaration within three years (under Article 38 of ETS 173), GRECO does not request Italy to provide additional information regarding recommendation ix(ii). Nevertheless, in line with GRECO's well established practice in respect of member states having deposited declarations, it encourages the authorities to reconsider this matter.

38. Consequently, GRECO concludes that recommendation ix remains partly implemented.

Theme II: Transparency of Party Funding

39. It is recalled that GRECO, in its Evaluation Report issued 7 recommendations in respect of Theme II. In the compliance procedure, until the preparation of the present report, recommendations i, ii, iii, v and vii had been implemented satisfactorily; recommendations iv and vi had been partly implemented.

Recommendation iv.

40. *GRECO recommended to (i) elaborate a coordinated approach for the publication of information on party and campaign finance; (ii) ensure that such information is made available in a coherent, comprehensible and timely manner and thereby provides for easier and meaningful access by the public, including by making best use of internet publishing.*

41. GRECO recalls that this recommendation was considered as partly implemented. GRECO welcomed the efforts made to facilitate information on political parties' finances, including through their online publication. GRECO however considered that additional efforts were required regarding the publication of campaign finances, notably, in respect of election candidates who had not been elected.

42. The authorities underscore that the accounts of non-elected candidates can be freely and entirely consulted by anyone in the premises of the Regional Electoral Colleges. The amount of any donations and any sort of services received by candidates (including non-elected candidates) may be freely consulted with the Chamber of Deputies, since candidates are under the obligation to send the so-called joint statements (signed at the same time by donors and beneficiaries) that indeed include the data mentioned above.

43. The authorities further add that while, strictly speaking, there have been no legislative novelties in this field, it should be pointed out that: (i) the Italian electoral Law does not contemplate the faculty for electors to express their preferences for candidates in a list, but basically it allows them to choose the party they consider to be the most suitable one. This circumstance implies that the expenditures for election campaigns are mostly borne by parties rather than the single candidates. Furthermore parties, as already highlighted by GRECO in its previous reports, are under the obligation to make public any information related to their accounting records and financial management on their internet sites, including the information on election campaigns (Article 5 of Legislative Decree No. 149 of 2013, converted into Law No. 13 of 2014); and (ii) to ensure transparency and facilitate access by the public to the widest extent possible as requested by GRECO, the Chamber of Deputies has decided to e-mail the information included in the joint

statements as per Article 4, paragraph 3 of Law No. 659 of 1981 in real time (i.e. amount of the sums of money and services received by a candidate at the election and identity of the donor) to any elector who makes such a request without expecting from him/her to personally go to the competent offices. A similar initiative was adopted by some Electoral Colleges that, as mentioned above, are under the obligation to ensure publicity for the accounts of expenditures in relation to election campaigns (Article 14 of Law No. 5151 of 1993).

44. GRECO takes note of the additional explanations submitted by the authorities. There have been no legislative novelties, but rather some measures of a practical nature to further facilitate public access to information on campaign finances, including in respect of non-elected candidates. GRECO is however not convinced that the measures reported would effectively address the main concern raised by recommendation iv, i.e. a holistic approach to publication of campaign finance that allows for easier and meaningful access by the public to such information. This concern must be read in parallel with GRECO's assessment of recommendation vi below on outstanding doubts in supervision, and is all the more relevant in the new framework for political financing in Italy which abolished direct public funding in 2017 in favour of a voluntary system of private funding.

45. GRECO concludes that recommendation iv remains partly implemented.

Recommendation vi.

46. *GRECO recommended (i) to provide a leading independent body assisted, if appropriate, by other authorities, with a mandate, tenure stability, adequate powers and resources to carry out a pro-active and efficient supervision, investigation and enforcement of political finance regulations; (ii) until that occurs, to ensure that the existing institutions with current responsibilities develop a practical working arrangement for the effective implementation of party and campaign funding rules; and (iii) to strengthen the cooperation and coordination of efforts on an operational and executive level between the authorities entrusted with the supervision of political finances and the tax and law enforcement authorities.*

47. GRECO recalls that this recommendation was considered as partly implemented. GRECO welcomed the establishment of the Committee for the Transparency and Control of Financial Statements of Parties and Political Movements with a supervisory role over the annual financial reports of political parties, but required additional details as to its operation and the effective coordination of its role with the other monitoring mechanisms of political financing.

48. The authorities of Italy now report that, in practical terms, a unified approach over the supervision of political finances is in place. The Court of Audit can be considered the leading institution in this new framework: it keeps its traditional role of verifying party expenditure during election campaigns, but it also stays on top of their routine finances given its presence in the Committee for the Transparency and Control of Financial Statements of Parties and Political Movements (i.e. three of the five members of the Committee are judges from the Court of Audit).

49. GRECO takes note of the reworked system to strengthen the control of party finances, notably through a first tier of private control (party accounts must be certified by an external auditor), as well as through public oversight. GRECO also notes that the Committee for the Transparency and Control of Financial Statements of Parties and Political Movements (hereinafter: the Committee) has been provided with greater stability (it can actually operate beyond a given legislature), further independence assurances (magistrates belonging to judicial bodies who work on a full time basis and cannot accept or carry out any other office or function during their mandate), as

well as inspection and sanctioning powers. GRECO notes that the Committee is an ad hoc body which needs to coordinate its action with two other existing bodies with key monitoring tasks in this area: the Court of Audit which is competent for the supervision of electoral expenditure of political parties, and the Regional Electoral Guarantee Board which is responsible for checking electoral expenditure of candidates. GRECO accepts that the composition of the Committee enables the coordination and exchange of information regarding annual and electoral finances of political parties. GRECO would, however, have appreciated greater details as to how the Committee and the Court of Audit coordinate their action with the Regional Electoral Guarantee Board, as well as on how all these different bodies effectively cooperate and cross-check information, including by resorting to tax and law enforcement authorities, as necessary. In the absence of additional information as to how this cooperation takes place on an operational level (and therefore beyond the text of the law), GRECO assesses recommendation vi(iii) as partly implemented. GRECO looks forward to receiving concrete practical details in this respect.

50. GRECO concludes that recommendation vi remains partly implemented.

III. CONCLUSIONS

51. **With the adoption of this Addendum to the Second Compliance Report on Italy and in light of the above, GRECO concludes that out of the sixteen recommendations issued to Italy, eight in total have been implemented satisfactorily or dealt with in a satisfactory manner.** Of the remaining recommendations seven remain partly implemented and one has not been implemented.

52. More precisely, with respect to Theme I – Incriminations – recommendations vi, vii and viii have been dealt with in a satisfactory manner, recommendations i, ii, iv, v and ix have been partly implemented and recommendation iii has not been implemented. With respect to Theme II – Transparency of Party Funding – recommendations i, ii, iii, v and vii have been implemented satisfactorily, recommendations iv and vi have been partly implemented.

53. With regard to incriminations, steps have been taken to criminalise bribery in the private sector, a positive move that must be welcomed. GRECO, however, regrets that the admissibility of prosecution is only possible upon individual complaint, unless the fact gives rise to distortion of competition in the acquisition of goods and services. Legislative proposals are currently under consideration by the Government in respect of the international dimension of bribery offences in the public sector. While these legislative initiatives are promising, none of them have been adopted as yet. Some shortcomings remain regarding the criminalisation of trading in influence. Ratification of the Additional Protocol to the Criminal Law Convention on Corruption is also a pending matter. Further, Italy's conventional obligations to deal with certain weaknesses of domestic legislation in respect of the Criminal Law Convention on Corruption are reduced by the reservations made by the country in accordance with Article 37 of the said Convention. In line with GRECO's well established practice in respect of member states having deposited reservations, the authorities are invited to reconsider their position in this regard.

54. On an encouraging note, GRECO notes with appreciation the efforts made by the authorities since the adoption of the previous compliance report to further advance in addressing what has been considered the Achilles heel of justice in Italy, i.e. the expiry of the statute of limitations. Two key changes were made in relation to corruption offences in this respect, notably by increasing limitation periods and by providing for additional grounds for suspension of the limitation period.

55. Further, with regard to political financing, Italy introduced major reforms starting in 2013 and gradually moving from public to private funding (with the effective abolishment of public financing in 2017). GRECO already acknowledged several positive features of the new system in its previous compliance reports (e.g. general ban on anonymous donations, lowered disclosure thresholds, upgraded sanctions, etc.). In such an evolving context of change, transparency and oversight acquire prime significance; more needs to be done regarding both aspects for corruption prevention purposes.

56. In conclusion, GRECO in accordance with Rule 31 revised, paragraph 9 of its Rules of Procedure asks the Head of the Italian delegation to submit additional information regarding the implementation of recommendations i-iii, v and ix (Theme I – Incriminations), as well as recommendations iv and vi (Theme II – Transparency of Party Funding) by 31 March 2019.

57. Finally, GRECO invites the authorities of Italy to authorise, as soon as possible, the publication of the report, to translate the report into the national language and to make this translation public.