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COMMISSION STAFF WORKING DOCUMENT

Accompanying the document

2026 Rule of Law Report

The rule of law situation in the European Union

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ABSTRACT

The level of perceived judicial independence in Finland continues to be very high among both the general public and companies. The working group aiming to strengthen the justice system continued its work. Constitutional amendments are being prepared to further safeguard the independence of the judiciary. Limited steps were taken on the issue of the appointment of lay judges. The remuneration system for lower court judges is being reviewed. The process of digitalisation of the justice system continues, while gaps remain. Reforms to the legal aid system are under consideration. The length of proceedings increased, despite streamlining efforts and temporary additional funding for the judiciary which will come to an end.

The implementation of the 2025-2027 Anti-Corruption Strategy and Action Plan is ongoing. Cooperation between the competent institutions has been strengthened further, with a focus on prevention. Steps have been taken to prepare legislative proposals to criminalise trading in influence and revise the provisions on foreign bribery. Post-employment rules for members of the Government were adopted and key anti-corruption and integrity promotion guidelines for ministers are planned to be compiled into a code of conduct in the course of 2026. Financial information on lobbying activities will be reported to the Finnish Transparency Register for the first time in July–August 2026. The election and party funding legislation was amended and training on whistleblower protection in the public administration has continued. Work continues to develop legislative and policy measures to address corruption risks in public procurement and to strengthen corruption risk assessment in other vulnerable sectors.

The national regulatory authority (Traficom) has been assigned new tasks with the entry into force of a new act for monitoring the media market, leading to concrete structural changes. The Council of Mass Media's funding was reduced as part of a series of austerity measures by the Government, while facing an increasing number of complaints. The amendments to the Act on the Finnish Broadcasting Company entered into force, aiming to strengthen the public service media's independence. However, the broadcaster's funding was reduced in 2024-2027, which led to the implementation of a savings programme. Two studies were commissioned by the Government following the review of changes to the Act on the Openness of Government activities and a new working group will be set up to prepare a new proposal for the next Government term. Overall, the framework for the protection of journalists has remained stable in Finland.

The law-making process is overall inclusive, though areas for improvement remain. Civic space continues to be considered open, while some stakeholders still highlight challenges with funding.

RECOMMENDATIONS

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, the Commission concludes the following:

- Limited progress has been made on the recommendation related to the appointment of lay judges, as the working group on Rule of Law Guarantees and Development of the Judicial System continues to examine the issue and is expected to publish a memorandum of its work by end of 2026. It is therefore recommended to Finland to *advance the reform of the system of lay judges, taking into account European standards on judicial independence*.
- As gaps remain in the digitalisation of judicial proceedings, it is recommended to Finland to *take further steps to improve the digitalisation of justice, including by improving the availability of digital tools to initiate and follow proceedings online*.
- Some progress has been made on strengthening the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions, as post-employment rules for members of the Government were adopted and the Anti-Corruption Strategy and Action Plan envisage compiling the key anti-corruption and integrity promotion guidelines for ministers into a dedicated single document in 2026. Since the adoption of the code of conduct is still pending, it is recommended to Finland to *strengthen the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions by adopting a code of conduct for them*.
- Limited progress has been made on advancing with the reform of the Act on the Openness of Government Activities, as two studies are being commissioned and a working group is expected to be set up to prepare a legislative proposal. Since the reform remains under review, it is recommended to Finland to *advance with the reform of the Act on the Openness of Government Activities to ensure effective access to documents taking into account the European standards on access to official documents*.

As regards the other 2025 recommendations, the Commission concludes that:

- Limited progress has been made on the recommendation to take forward the revision of the criminal offence of foreign bribery, as a working group was set up to draft the relevant legislation in the context of transposing the EU Anti-Corruption Directive. Monitoring of further developments in this area will continue in the Rule of Law Report.

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Finland continues to be very high among both the general public and companies. Overall, 85% of the general population and of companies perceived the level of independence of courts and judges to be ‘fairly or very good’ in 2026². The perceived judicial independence among the general public has decreased in comparison with 2025 (89%) and has slightly decreased in comparison with 2022 (88%). The perceived judicial independence among companies has decreased in comparison with 2025 (90%) and has slightly decreased in comparison with 2022 (87%).

The working group aiming to strengthen the justice system continued its work. The working group ‘Rule of Law Guarantees and Development of the Judicial System’ and its subgroup ‘Constitutional Guarantees for the Independence of the Judiciary’ continued their activities³. These included assessing whether the current Constitution and legislative framework can sufficiently safeguard the independence of the judiciary and proposing possible legislative amendments as deemed necessary⁴. The working group has undertaken substantial work under 27 different project groups, each of which is preparing a memorandum of their work, including proposals for legislative amendments. These memoranda are expected to be published by the end of 2026 and will be submitted for public consultation⁵. While welcoming the efforts of the working group, stakeholders stress the need for sustained political commitment so that the working group’s proposals can be integrated into the next Government’s programme⁶.

Constitutional amendments to further safeguard the independence of the judiciary are in preparation. The working group on Constitutional Guarantees for the Independence of the Judiciary prepared a draft memorandum in October 2025 proposing constitutional amendments with the aim of strengthening the independence of the judiciary. The draft memorandum focuses on the court administration, the number of judges in highest courts, the right for judges to remain in office, the procedure for appointing judges and safeguarding the autonomy of the prosecution service. In March 2026, the Venice Commission gave an opinion on the draft memorandum⁷ which broadly welcomed the proposed draft amendments as contributing to strengthening the formal basis of the independence of the judiciary at constitutional level⁸. Following the opinion, the working group is set to continue the preparatory work towards a memorandum, including proposals for constitutional amendments, in which also other topics not yet included in the draft memorandum are expected to be reflected, including the right to independent legal advice⁹. While the work

¹ An overview of the institutional framework for all four pillars can be found [here](#).

² Figures 48 and 50, 2026 EU Justice Scoreboard and Figures 51 and 53, 2024 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ 2025 Rule of Law Report, Finland, p. 4. The working group was set up by the Ministry of Justice in February 2023.

⁴ Finnish Government (2026a), written input, p. 27.

⁵ Country visit Finland, Ministry of Justice.

⁶ Country visit Finland, Supreme Court, Supreme Administrative Court, Association of Judges, Finnish Bar Association, Human Rights Centre, and Amnesty International Finland.

⁷ Working Group on Constitutional Guarantees for the Independence of the Judiciary (2025).

⁸ Venice Commission (2026).

⁹ Country visit Finland, Supreme Court, and Finnish Bar Association.

preparing the constitutional amendments is overall welcomed by stakeholders¹⁰, some regretted that issues such as availability of *ex-post* constitutional review are not included, noting that currently courts can only disregard unconstitutional laws in cases of an “evident” conflict, reducing constitutional oversight¹¹. This issue was also noted by the Venice Commission¹². The preparatory work on the constitutional amendments is expected to serve for the preparation of a possible government proposal during the next Government’s term¹³.

Limited progress has been made on the recommendation to reform the appointment of lay judges¹⁴. Lay judges, who currently serve in certain civil and serious criminal cases, are appointed by political parties, with the number of appointments determined by local election results. Reforming the lay judge system is under consideration by the Ministry of Justice, which conducted consultations on an assessment report examining alternatives for the system and published a summary of the consultation results in September 2025¹⁵. The consultations showed that abandoning the institution of lay judges is widely supported¹⁶ and that the current system of appointments is seen as problematic for the independence of the judiciary¹⁷. Although the Supreme Court has not identified constitutional barriers to abolishing the lay judge system before its current term ends in 2029¹⁸, the cost of reform is expected to be an obstacle to change¹⁹. At the same time, placing more emphasis on the role of professional judges at the courts of first instance is seen as an opportunity to reduce the number of cases appealed²⁰. The question of the lay judge system continues to be debated in one of the project groups set up by the working group on Rule of Law Guarantees and Development of the Judicial System, which is examining the rules regarding the composition of the general courts. The project group has held several meetings, including to examine proposals to abolish the lay judge system and expanding the use of panels of multiple judges in serious criminal cases and expanding the powers of single judges in the Court of Appeal²¹. The issue of the lay judge system is also considered by the working group on Constitutional Guarantees for the Independence of the Judiciary²². In light of the current situation, limited progress has been made on the recommendation.

¹⁰ Country visit Finland, Supreme Court, and Finnish Bar Association.

¹¹ Country visit Finland, Human Rights Centre, Amnesty International Finland, and Demla.

¹² Venice Commission (2026). The opinion noted that excluding this issue from the scope of the mandate of the working group is a missed opportunity.

¹³ Finnish Government (2026b), additional written input. Under the normal constitutional procedure, constitutional amendments require the approval of two consecutive governments which would mean that the amendments would come into force earliest in 2031.

¹⁴ The 2025 Rule of Law Report recommended to Finland to “[r]eform the appointment of lay judges, taking into account European standards on judicial independence.” Limited progress was previously assessed on this recommendation in 2025.

¹⁵ Ministry of Justice (2025a) and Ministry of Justice (2025b).

¹⁶ Ministry of Justice (2025b) and Finnish Government (2026a), written input, p. 1.

¹⁷ Country visit Finland, Supreme Court, National Courts Administration, Demla, and the Federation of Finnish Enterprises. European Association of Judges (2026), p. 7.

¹⁸ Country visit Finland, Supreme Court. This was also noted by the assessment report by the Ministry of Justice, which stated that there is no need to link the timing of the abolition of the lay judge system to the lay judges’ term of office. Ministry of Justice (2025a) p. 64.

¹⁹ Country visit Finland, Supreme Court, National Courts Administration, Finnish Bar Association, and Demla.

²⁰ Country visit Finland, Supreme Court, and Demla.

²¹ Finnish Government (2026b), additional written input.

²² Working Group on Constitutional Guarantees for the Independence of the Judiciary (2025), pp. 61-63.

Quality

The remuneration system for lower court judges is under discussion. The National Courts Administration is reviewing the remuneration system for lower court judges²³, which sets out that the salaries of District Court judges are established by a collective agreement while the salaries of Supreme Court judges are established by law. The Finnish Judges' Association has called for all judges' salaries to be established by law with a view to better guaranteeing the independence of judges, as well as for an explicit reference to be added in the Constitution that the remuneration of judges must be sufficient to ensure their independence²⁴. The Association further pointed at emerging trends of judges supplementing their income through side employment or leaving the judiciary for private sector roles where significantly higher earnings are offered²⁵. Fixed term contracts for judges, instead of permanent positions, continue to be used particularly in lower courts, due to the current budgetary situation of the judiciary²⁶. At the same time, budget constraints are seen to restrict the National Courts Administration's capacity to effectively respond to the needs of the judiciary, including as regards providing relevant training²⁷.

Steps have been taken towards further digitalisation of the justice system while gaps remain. E-services for citizens were rolled out for divorce cases with over 80% of new filings now handled electronically, and it is planned to expand this also to other civil, commercial, and criminal matters by the end of 2026²⁸. Finland does not yet have digital solutions for initiating and following proceedings in civil, commercial and administrative cases, and not all steps in judicial proceedings can be carried out online, including paying court fees and tracking ongoing cases²⁹. The reliance on manual processes, such as the storage of documents in court systems and their transmission to litigants, is seen to reduce procedural efficiency. Since citizens and their legal representatives have no direct digital access, they must request case updates from courts, which adds to the workload of an already strained judiciary³⁰. At the same time, the planned electronic portal for lawyers and legal representatives remains pending while some functions are planned to be made available by the end of 2026³¹. The portal is seen as an important tool both for improving court efficiency as well as for ensuring equality of arms in criminal proceedings³².

Reforms to the legal aid system are under consideration. The National Legal Services Authority proposed changes to its organisational structure, aiming to strengthen operational efficiency, enhance service consistency, and improve resource allocation, while adjusting to a reduced budget³³. Stakeholders continued to note concerns over the low level of legal aid

²³ Country visit Finland, National Courts Administration, and Finnish Association of Judges.

²⁴ Finnish Association of Judges (2026).

²⁵ Country visit Finland, Finnish Association of Judges. European Association of Judges (2026), p. 24.

²⁶ Country visit Finland, Supreme Administrative Court, and Finnish Association of Judges.

²⁷ Country visit Finland, Finnish Association of Judges, and National Courts Administration. European Association of Judges (2026), p. 29.

²⁸ Finnish Government (2026a), written input p. 7. Country visit Finland, Ministry of Justice, and National Courts Administration.

²⁹ Figure 44, 2026 EU Justice Scoreboard.

³⁰ Finnish Bar Association (2026), written input p. 3-4.

³¹ Country visit Finland, National Courts Administration.

³² Finnish Bar Association (2026), written input p. 3.

³³ The operating expenses of the National Legal Services Authority have been permanently reduced by EUR 4.69 million. In addition, the 2026 budget proposal includes an EUR 1.28 million cut. In February 2026, the National Legal Services Authority gave its proposal to the Ministry of Justice. National Legal Services Authority (2026).

fees³⁴, despite the increase of legal aid fees for private practitioners introduced in 2025³⁵. The Government noted that changes to the conditions for granting legal aid with the aim of improving access to legal aid are under consideration³⁶.

Efficiency

Latest figures indicate a notable increase in length of certain proceedings despite a temporary increase in budget and streamlining efforts. The time taken to reach a decision in litigious civil and commercial cases at first instance courts continued to grow, from 349 days in 2023 to 464 days in 2024³⁷. The processing times continued to lengthen despite temporary additional funding for the judiciary between 2024-2026³⁸, and concerns are growing over case delays and resource constraints³⁹. The termination of the supplementary budget and overall budget cuts risk increasing delays⁴⁰. The length of proceedings is seen as more acute in the capital region, and the working group on Rule of Law Guarantees and Development of the Judicial System is discussing the possibility of distributing cases more equally across the country⁴¹. At the same time, the Government introduced measures to streamline criminal proceedings, for instance by expanding the scope of written proceedings, easing attendance requirements, and strengthening prosecutor-investigator cooperation⁴². While the new measures are seen as potentially beneficial for the efficiency of the proceedings⁴³, hesitations remain on their effectiveness⁴⁴, and stakeholders stress the need to ensure that these measures do not compromise the right to an effective remedy⁴⁵. The length of proceedings is seen by stakeholders to hinder access to justice also for business⁴⁶, who would like to see small claims procedure extended to all small value claims⁴⁷, as opposed to the current limited scope only covering rental disputes. Business representatives further note

³⁴ Finnish Bar Association (2026), written input p. 2.

³⁵ The legal aid fee was raised from EUR 110 to EUR 120 per hour.

³⁶ Finnish Government (2026a), written input p. 3.

³⁷ Figure 5, 2026 EU Justice Scoreboard.

³⁸ Increase of 30 million in 2024, 65 million in 2025 and 80 million in 2026. Finnish Government (2026a), written input pp. 4-5.

³⁹ Finnish Bar Association (2026), written input p. 4, Country visit Finland, Supreme Court, Supreme Administrative Court, National Prosecution Authority, National Courts Administration, Parliamentary Ombudsman, Finnish Association of Judges, Finnish Bar Association, Confederation of Finnish Industries, Federation of Finnish Enterprises, Finnish Competition and Consumer Authority, and Human Rights Centre. In 2025, the Government paid compensation for case delays in 158 cases, up from 102 cases in 2024 and 85 cases in 2023. Country visit Finland, Finnish Association of Judges. European Association of Judges (2026), p. 20 and p. 22.

⁴⁰ Finnish Bar Association (2026), written input p. 3. Country visit Finland, Finnish Association of Judges. National Courts Administration notes that according to the Ministry of Finance's proposal, the funding for courts for 2027 is approximately 19 million euros less than before. This corresponds to approximately 270 person-years in the court system. National Courts Administration (2026).

⁴¹ Country visit Finland, Finnish Association of Judges. European Association of Judges (2026), p. 18.

⁴² Finnish Government (2026a), written input, pp. 8-9.

⁴³ Country visit Finland, National Prosecution Authority.

⁴⁴ Country visit Finland, National Courts Administration, Finnish Bar Association and Finnish Association of Judges.

⁴⁵ Country visit Finland, Finnish Bar Association and Finnish Association of Judges. The Finnish Association of Judges also sees it as problematic that, according to the association, perceived savings from efficiency measures seem to be directly cut from court budgets, risking longer case processing times rather than systemic improvement.

⁴⁶ Country visit Finland, Finland Chamber of Commerce, Confederation of Finnish Industries and Federation of Finnish Enterprises.

⁴⁷ Country visit Finland, Federation of Finnish Enterprises.

that applicants bear a disproportionate share of legal costs in administrative appeals regardless of the outcome of the appeal, as reimbursement remains limited in practice⁴⁸.

II. ANTI-CORRUPTION FRAMEWORK

The perception among experts, citizens and business executives is that Finland is one of the least corrupt countries in the world. In the 2025 Corruption Perceptions Index by Transparency International, Finland scores 88/100 and ranks 2nd in the European Union and 2nd globally⁴⁹. This perception has been stable over the past five years⁵⁰. The 2026 Special Eurobarometer on Corruption shows that 25% of respondents consider corruption widespread in their country (EU average 71%) and 8% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 24% of companies consider that corruption is widespread (EU average 65%) and 16% consider that corruption is a problem when doing business (EU average 37%). Furthermore, 45% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 38%), while 54% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 31%)⁵¹.

The implementation of the 2025-2027 Anti-Corruption Strategy and Action Plan is ongoing. Implementation of the Strategy is well underway, with certain actions already completed⁵². An inter-ministerial preparation and steering group appointed by the Ministry of Justice monitors the implementation and reports on the progress to the ministerial working group on internal security and administration of justice⁵³. The state of implementation of the 2021-2023 Strategy and Action Plan was assessed in a final report published by the Ministry of Justice. Additionally, the National Audit Office assessed the impact of the strategic framework in the context of a performance audit on the capacity of central government to effectively combat corruption⁵⁴. Implementation of the Strategy is well underway, with certain actions already completed. The first national corruption situation report, which tracks progress with the Action Plan, was published in May 2026⁵⁵. The National Anti-Corruption Cooperation Network's mandate was renewed for the period 2025-2027 and the network held its first meeting in November 2025⁵⁶.

⁴⁸ Country visit Finland, Finland Chamber of Commerce and Confederation of Finnish Industries.

⁴⁹ The level of perceived corruption is categorised as follows: low (the perception among experts and business executives of public sector corruption scores above 79); relatively low (scores between 79-60), relatively high (scores between 59-50), high (scores below 50).

⁵⁰ In 2021 the score was 88, while, in 2025, the score was also 88. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points); has been relatively stable (changes from 1-3 points) in the last five years.

⁵¹ Data from special Eurobarometer 561 (2025). Flash Eurobarometer 557 (2025).

⁵² Finnish Government (2025a).

⁵³ This includes, for instance, measure 6.1.2 "Prepare a comparative report on the state of the public service ethical code in central government". Finnish Government (2026a), written input, p. 11.

⁵⁴ The Government report details the measures that were taken under each of the six areas of action. Finnish Government (2025c). Moreover, a 2025 National Audit Office performance audit found that that corruption risk assessment is not well established, while in some organisations there was uncertainty about reporting suspected cases of corruption. It recommended strengthening risk assessment and management and the dissemination of good anti-corruption practices in the central government. Finnish Government (2026b), additional written input.

⁵⁵ The situation report also provides survey data and statistics on corruption offences. Finnish Government (2026b), additional written input.

⁵⁶ The Anti-Corruption Cooperation Network was established in 2002 and is comprised of ministries, law enforcement and oversight bodies, representatives of local authorities, representatives of civil society,

Cooperation between institutions responsible for the fight against corruption has been strengthened further, with a focus on prevention activities. The National Bureau of Investigation, the Tax Authority and the Competition and Consumer Authority have strengthened their cooperation in the field of corruption prevention. A project between these three institutions aims to provide training to elected representatives and public officials of the 21 recently established ‘wellbeing services counties’⁵⁷. The training covers the detection of corruption in public procurement, the identification and prevention of conflicts of interest, as well as rules on gifts and preventing undue influence⁵⁸. Cooperation between the EPPO and the National Bureau of Investigation remains efficient⁵⁹. The police and prosecution report that resources available are overall sufficient to perform their tasks, although the prosecution also underlined the increased complexity of corruption cases⁶⁰. An online course for law enforcement, prosecutors and judges, released on 9 December 2025, was produced as part of an EU-funded project on Strengthening Fight against Corruption (2024–2026). The project also included workshops focused on enhancing operational cooperation among police and prosecutors based on examples of recent corruption cases⁶¹.

There has been limited progress on the recommendation to adopt legislation to revise the foreign bribery offence⁶². As reported in previous years, the Ministry of Justice prepared a draft proposal on criminalising trading in influence in 2022 but put it on hold until the adoption of the EU Anti-Corruption Directive⁶³. According to the current Action Plan, the measures transposing the Anti-Corruption Directive in national legislation will include the criminalisation of trading in influence. The legislative changes concerning foreign bribery would also be brought forward in this context⁶⁴. The Ministry of Justice set up a working group for the period 12 January 2026–31 March 2027, which will draft the relevant legislative proposals. It held its first meeting in February 2026⁶⁵. A new online training course for police officers, prosecutors and judges covering bribery offences and offences in public office addresses, among others, elements of bribery offences, assessment of evidence and intent, and the bribery of foreign officials⁶⁶. Overall, as the Government has initiated preparatory work to criminalise trading in influence and revise the provisions on foreign bribery further to

business and industry. It is coordinated by the Ministry of Justice and plays an important national role in increasing awareness of corruption, promoting cross-sectoral cooperation, and implementing international anti-corruption agreements and related international recommendations.

⁵⁷ Self-governing divisions responsible for organising health, social and emergency services in Finland.

⁵⁸ Country visit Finland, FCCA and NBI. Finnish Government (2026a), written input, p. 10.

⁵⁹ As of 26 February 2026, NBI and the police report had 6 ongoing cases with a corruption element. Prosecution services received 9 cases of corruption from the police in 2025, compared to 20 in 2024. Country visit Finland, National Prosecution Authority and Finnish Government (2026a), written input, annex, p. 1. No EPPO corruption cases have been reported in Finland in 2025. EPPO (2026), p. 24.

⁶⁰ Country visit Finland, National Prosecution Authority.

⁶¹ Finnish Government (2026a), written input, p. 17. Finnish Government (2026b), additional written input.

⁶² The 2025 Rule of Law Report recommended to Finland to “[t]ake forward the revision of the criminal offence of foreign bribery”. Limited progress was previously assessed on this recommendation in 2025. The revision of the foreign bribery offence has also been recommended by the OECD. See also OECD (2024), pp. 2–3.

⁶³ 2025 Rule of Law Report, Finland, pp. 8–9.

⁶⁴ Actions 5.1.1 and 5.1.2 of the current Action Plan. Finnish Government (2026a), written input, pp. 1–2 and p. 11. The timeline for completion has been set between 2025 and 2027 for both measures. A preparatory study, published by the Ministry of Justice in May 2024, proposed alternative models for simplifying the essential elements of laws on bribery, criminalising trading in influence, improving the efficiency of imposing confiscation in bribery of a foreign party, and clarifying the definition of a foreign official. See also 2025 Rule of Law Report, Finland, p. 9.

⁶⁵ Country visit Finland, Ministry of Justice.

⁶⁶ Finnish Government (2026a), written input, p. 17.

the adoption of the new EU legislation, limited progress has been made on this recommendation.

There has been some progress on the recommendation to further strengthen the integrity framework for ministers, as post-employment rules for members of the Government were adopted, while the adoption of a code of conduct is still pending⁶⁷. The legislative proposal on post-employment restrictions for current members of the Government was adopted in June 2026. It limits the right of ministers to move to another position for up to 12 months after the end of their term⁶⁸. Ministers are required to notify their intention to transfer to certain positions outside of the public sector to a suspension board, when it may give rise to a conflict of interest or undermine trust in the exercise of government power⁶⁹. The board may then impose a cooling-off period of up to 12 months. The Civil Servants Act establishes a six-month cooling-off period for special advisers and a 12-month cooling off period for civil servants⁷⁰. A code of conduct for ministers has not been adopted yet. The existing Code of Conduct for civil servants and top executive functions does not apply to ministers, whereas the Minister's Handbook does not address integrity matters in a comprehensive manner⁷¹. To address this, the Anti-Corruption Strategy and Action Plan envisage compiling the key anti-corruption and integrity promotion guidelines for ministers, currently spread across different documents, into a dedicated single document during 2026⁷². The oversight of compliance with integrity requirements is ensured by the Chancellor of Justice⁷³. The review of asset and interest declarations of ministers and disclosures of other persons entrusted with top executive functions is carried out by the Chancellor of Justice or by the relevant ministries. These checks are based solely on the information disclosed in the

⁶⁷ The 2025 Rule of Law Report recommended to Finland to “[c]ontinue efforts to strengthen the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions by adopting a code of conduct for them.” Limited progress was previously assessed on this recommendation in 2025.

⁶⁸ Finnish Government (2026b), additional written input. See also 2025 Rule of Law Report, Finland, p. 10. Parliament's response EV 99/2026vp - HE 90/2024 vp, Parliament (2026). Publication and entry into force of the law are pending, and in the meanwhile a non-mandatory cooling-off period of up to six months continues to apply, with the involvement of an advisory board. See also GRECO (2026), pp. 9-11.

⁶⁹ According to Section 3 of the law these may include a management position in a state-owned enterprise, or a corporation, foundation, association or other legal person governed by private law, or taking up of a business activity. The law applies to former ministers within twelve months after their resignation and contains provisions on the appointment, composition and operation of the suspension board.

⁷⁰ Act on Public Officials in Central Government. As regards the differences in the duration of cooling off periods, GRECO has stressed the importance of maintaining consistency, coherence and proportionality in the legislation and its application in order to maintain public trust in the integrity of the government. GRECO (2026), p. 11.

⁷¹ The Handbook provides comprehensive information on the organisation and functioning of the Government, as well as the role of a member of Government. In that context, it addresses integrity matters such as management of conflicts of interest by members of the Government and State Secretaries, disqualification of a minister from decision-making, hospitality, benefits and gifts, the exercise of secondary positions, disclosure of interests and post-employment restrictions for State Secretaries and advisers. Nevertheless, in its latest report, GRECO concluded that, given the breadth and purpose of the Handbook, it is not equivalent to a code of conduct and does not compile all relevant integrity rules. GRECO (2026), p. 5 and GRECO (2024), pp.5-6. 2025 Rule of Law Report, Finland, p. 9. Article 63 of the Constitution lays down the ground for rules on conflicts of interest for Members of the Government. Finnish Government (2026b), additional written input.

⁷² Measure 2.3.3 of the Anti-corruption Action Plan.

⁷³ In line with the Act on the Chancellor of Justice, the Chancellor of Justice may take measures when it finds that a decision or action by the government or a member of the government breaches integrity rules. In the event of a breach of ethics, the acts of persons with top executive functions may give rise to criminal liability, civil liability and administrative liability. See also GRECO (2026), pp. 3-6.

declaration forms, without reference to existing databases or pursuant to a common verification methodology⁷⁴. Further measures are envisaged under the Anti-Corruption Action Plan, including the analysis of the possibility of making declarations available in an accessible database and setting up a mechanism for their verification⁷⁵. Anti-corruption and integrity training is integrated into the induction programme of new public officials and there is an online course tailored specifically to high-level officials⁷⁶. Overall, given that steps were taken to strengthen the integrity framework for members of the Government, while the adoption a code of conduct is still pending, some progress has been made on this recommendation.

The transparency register is functioning well and financial information on lobbying activities will be reported to the Finnish Transparency Register for the first time between July and August 2026. The 2024 Transparency Registry Act sets out requirements in relation to the registration of influencing activities and related professional advice⁷⁷. Following the decision of the National Audit Office in December 2024, the financial information of lobbying and lobbying consultancy carried out in 2025 will be reported to the Finnish Transparency Register for the first time between July and August 2026⁷⁸. Civil society considers the transparency register as an important tool to ensure transparency in the public sector but also stresses the need for its extension to local levels, especially following the creation of wellbeing services counties⁷⁹. The Anti-Corruption Action Plan envisages an evaluation under the Act on the Transparency Register based on its implementation, as well as a preliminary study on expanding the scope of application⁸⁰.

Oversight by the National Audit Office of activities regarding election and party funding has continued. In 2025, the National Audit Office audited 61 party organisations, including those represented in Parliament. As in previous years, the Office found that the overseen entities had not reported all external support in up-to-date disclosures to the political party funding register⁸¹. National legislation does not establish caps on campaign donations or campaign expenditure.

The provision of training on whistleblower protection has continued throughout the public administration. In line with the 2023 Whistleblower Protection Act, transposing Directive (EU) 2019/1937, the Office of the Chancellor of Justice acts as a centralised external reporting channel for whistleblower protection⁸². Relevant training material and an online course are maintained on the Ministry of Justice webpage. The whistleblower

⁷⁴ Country visit Finland, Ministry of Justice and Chancellor of Justice. See also GRECO (2026), pp. 8-9.

⁷⁵ Measure 3.1.2 of the Anti-corruption Action Plan.

⁷⁶ Finnish Government (2026a), written input, p. 11.

⁷⁷ Lobbying activities targeted at Parliament and ministries must be reported to the Transparency Register, managed by the National Audit Office. Transparency Register Act. 2025 Rule of Law Report, Finland, p. 10.

⁷⁸ After that, this financial information will be disclosed annually. Finnish Government (2026a), written input, p. 13.

⁷⁹ Country visit Finland, Transparency International Finland. Wellbeing services counties are self-governing administrative divisions to which the tasks and organisational responsibility for social, healthcare and emergency services, previously exercised by municipalities, were transferred in 2023. Their highest decision-making body is the County council, responsible for the operation, administration and finances of the county. The members of the County council are elected in the county elections for a four-year term.

⁸⁰ Measure 3.1.1 of the Anti-corruption Action Plan.

⁸¹ National Audit Office (2026).

⁸² Finnish Government (2026a), written input, p.14. The national legislation covers the list of sectoral areas defined in the Directive. Anonymous reporting may be allowed if accepted by the institution.

protection training project, aimed at experts handling whistleblower reports, gathered over 7 000 participants⁸³. A wider audience was reached also via social media campaigns and information provided by the national broadcaster⁸⁴. The internal reporting channels within the Border Guard and the Police are reported to function well, although none of the notifications received in 2024 fell within the scope of application of the Whistleblower Protection Act⁸⁵.

Work continues to develop legislative and policy measures to address corruption risks in public procurement and to strengthen corruption risk assessment in other vulnerable sectors. Businesses' attitudes towards corruption in the EU shows that 16% of companies in Finland (EU average 30%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years⁸⁶. 87% of businesses perceive the level of independence of the public procurement review body (the Market Court) as very or fairly good, which has slightly increased in comparison with 2025 (84%)⁸⁷. Public procurement (including bid rigging) remains the main high-risk sector of corruption⁸⁸. The Single Market and Competitiveness Scoreboard on access to public procurement in Finland reports 16% of single bids for 2023 (EU average 27%). The 2025-2027 Anti-corruption Strategy and Action Plan confirm that construction, public procurement, urban planning, and party and election funding remain among the areas vulnerable to corruption⁸⁹. The corruption situation report also includes survey data on key risk areas of corruption⁹⁰. As regards public procurement, amendments to the Act on Public Procurement were submitted to Parliament in February 2026, establishing new grounds for exclusion and improving supervision and transparency⁹¹. In addition, seminars and training courses have continuously focused on corruption risks in public procurement, both at the central and local levels⁹². Stakeholders also point to new corruption risks related to well-being services counties established in 2023. Vulnerabilities arise from the possibility for elected officials to serve both in well-being services counties and municipalities, which raises risks of conflicts of interest, as well as from the powers of well-being services counties to manage large public budgets⁹³. Several measures in the Action Plan aim to mitigate risks in vulnerable sectors, as well as to strengthen corruption risk assessment more generally⁹⁴.

⁸³ The project ran from 1 September 2023 until 30 April 2025. Finnish Government (2026a), written input, p. 14.

⁸⁴ Finnish Government (2026a), written input, p. 10.

⁸⁵ Finnish Government (2026a), written input, p. 14. See also GRECO (2026), pp. 14-16. The Police envisage further measures to strengthen whistleblower protection, including adding detailed practical guidance on the intranet, as well as conducting awareness-raising activities.

⁸⁶ Flash Eurobarometer 557 (2025). This is 4 percentage points below the EU average.

⁸⁷ Figure 59, 2026 EU Justice Scoreboard.

⁸⁸ Country visit Finland, National Police Board, Finnish Competition and Consumer Authority, Confederation of Finnish Industries, Finnish Chamber of Commerce and National Prosecution Authority. Finnish Government (2026a), written input, pp. 18-20.

⁸⁹ Finnish Government (2026a), written input, pp. 14-15. The corruption situation report also includes survey data on key risk areas of corruption.

⁹⁰ Finnish Government (2026b), additional written input.

⁹¹ Ministry of Economic Affairs and Employment, 2026. The overall aim of the reform is to improve competition in public procurement.

⁹² Finnish Government (2026a), written input, p. 15.

⁹³ Country visit Finland, Ministry of Finance, Finnish Competition and Consumer Authority, National Prosecutor Authority, National Bureau of Investigation, Financial Intelligence Unit, and National Police. See also Ministry of Finance (2023), which recommended at that time the adoption of legislative safeguards.

⁹⁴ See, for instance, Measures 2.4, 3.2, 3.3, 1.2.5, 4.1.4 of the Anti-corruption Action Plan.

III. MEDIA PLURALISM AND MEDIA FREEDOM

The national regulatory authority has been assigned new tasks, with no perceived negative impact on human resources. A new act for monitoring the media market entered into force in August 2025, with a view to aligning with EMFA. The act assigns the national regulatory authority Traficom the task of assessing media mergers from a pluralism perspective and establishing a national media ownership database⁹⁵. In addition, it stipulates that Traficom will publish an annual report regarding the allocation of state advertising expenditure to media service providers and to providers of online platforms⁹⁶. The internal restructuring of Traficom initiated in 2024 was finalised. In particular, a new unit for media supervision and market surveillance was formed in 2025 to improve the flow of information and facilitate cooperation. No negative impact on human resources has been reported as a result of these new tasks assigned to the media regulator⁹⁷.

The Council of Mass Media is facing funding restraints. As part of a series of austerity measures, the Government has reduced the funding for the Finnish Council of Mass Media in 2025. The reduction in Government funding has led to member organisations increasing their contributions to ensure a stable budget. Consequently, the proportion of state funding decreased from 29 percent to 20 percent⁹⁸. Despite the member organisations compensating for the Government's cuts, the Council's total resources remain scarce in light of the increasing number of complaints it handles⁹⁹.

The independence of public service media was strengthened amidst budget reductions. In August 2025, the amendments to the Act on the Finnish Broadcasting Company entered into force. These include a new provision regarding the criteria for the selection and dismissal of executives involved in decision-making and editorial policy of the Finnish Broadcasting Company (Yle)¹⁰⁰. The independence of the public service media is generally considered to be high¹⁰¹ and assessed as low risk (22%), but there are signs that state pressure is increasing on public service media in view of recent funding cuts¹⁰². Following a decision in September 2024 by a cross-party parliamentary working group to reduce the broadcaster's funding in 2024-2027, Yle carried out another round of redundancies in June 2025. In total, the number of person-years in all employment relationships decreased by 280 compared to the previous year¹⁰³. Stakeholders have criticised these cuts as unpredictable, citing uncertainty regarding the possibility of future cuts¹⁰⁴. The redundancies are part of a broader savings programme to ensure that the national public broadcaster's finances remain balanced in the coming years, despite the reduced funding¹⁰⁵.

Limited progress has been made on the recommendation to advance the reform of the Act on the Openness of Government Activities¹⁰⁶. Implementation of the reform of the Act

⁹⁵ Traficom was designated Digital Services Coordinator in 2024.

⁹⁶ Finnish Government (2026a), written input, pp. 17-19.

⁹⁷ Country visit Finland, Traficom.

⁹⁸ Union of Journalists in Finland (2026), written input, p. 15.

⁹⁹ Country visit Finland, Council of Mass Media.

¹⁰⁰ Finnish Government (2026a), written input, p. 18

¹⁰¹ Union of Journalists in Finland (2026), written input, p. 16

¹⁰² Media Pluralism Monitor (2026), Finland country profile, p.29.

¹⁰³ Country visit Finland, Finnish Broadcasting Company; Yle (2026).

¹⁰⁴ Country visit Finland, Council of Mass Media.

¹⁰⁵ Country visit Finland, Finnish Broadcasting Company.

¹⁰⁶ 2025 Rule of Law Report recommended Finland to “advance with the reform of the Act on the Openness of Government Activities to ensure effective and wider access to documents taking into account the European

on the Openness of the Government Activities and the related recommendations of the dedicated working group¹⁰⁷ remain under review. Due to changes in the national security environment and the feedback received through a public consultation¹⁰⁸, the Government decided to expand the objective of the reform to also consider the need to change secrecy provisions in the Act, and two additional studies are planned to be commissioned in this regard on the balance between transparency and security requirements, and the balance between transparency and privacy. After gathering sufficient information, a new working group is planned to be set up to prepare a new legislative proposal for the next Government term¹⁰⁹. While the objective of reforming the Act on the Openness of Government Activities is to strengthen transparency in a number of areas, some stakeholders express concern that the potential tightening of secrecy rules might instead reduce transparency and openness, thereby continuing a trend of reduced accessibility of documents observed in recent years¹¹⁰. Finland has ratified the Council of Europe Convention on Access to Official Documents¹¹¹. Overall, as the Government is continuing the work towards the reform, limited progress has been made on the recommendation.

The framework for the protection of journalists has remained stable overall. Since the 2025 Rule of Law Report, no new alerts for Finland have been published on the Council of Europe’s Platform to promote the protection of journalism and safety of journalists¹¹², while the Mapping Media Freedom platform registered two alerts¹¹³. In May 2026, legislation covering cross-border cases was adopted with the aim to transpose the EU Anti-SLAPP Directive¹¹⁴. No SLAPP cases have been recently identified in Finland¹¹⁵, however some stakeholders note an increase in online targeting and harassment against journalists¹¹⁶. Following a Supreme Administrative Court’s ruling on compensation by a media company of journalists’ costs of a criminal procedure, the Income Tax Act was amended, allowing the legal expenses paid by an employer to be exempt from tax, if the act of an employed journalist occurred as part of his or her work duties¹¹⁷. Stakeholders raised concerns that freelance journalists, who are self-employed and not covered by the ruling, remain

standards on access to official documents.” Some further progress was previously assessed on this recommendation in 2025.

¹⁰⁷ A dedicated working group, appointed by the Ministry of Justice in 2021, gave a proposal in December 2023 on making the Act on the Openness of Government Activities more effective. This included for instance recommendations to clarify the provisions on the handling of requests for information, while reconciling the protection of personal data with the principle of openness. The recommendations also suggested expanding the scope of application of the Act to private parties responsible for certain public administrative duties and corporations or foundations controlled by a public body. Ministry of Justice (2023), the Working Group proposes a reform of the Act on the Openness of Government Activities.

¹⁰⁸ Ministry of Justice (2025c), p. 6.

¹⁰⁹ Finnish Government (2026a), written input, p. 2.

¹¹⁰ Union of Journalists in Finland (2026), written input, p. 14; Amnesty International (2026), written input, p. 12.

¹¹¹ The Council of Europe Convention on Access to Official Documents (CETS No. 205), also known as the Tromsø Convention, entered into force on 1 December 2020.

¹¹² Council of Europe, Platform to promote the protection of journalism and safety of journalists, Finland.

¹¹³ One alert concerned blocked access to information, while the other concerned spoofing. Mapping Media Freedom, Finland country profile.

¹¹⁴ Act on the protection of persons participating in public debate from cross-border harassment claims and amendment of the Act on the Enforcement of Fines; it does not cover domestic cases.

¹¹⁵ Finnish Government (2026a), written input, p. 19.

¹¹⁶ Union of Journalists in Finland (2026), written input, p. 17. Amnesty International (2026), written input p. 23.

¹¹⁷ Finnish Government (2026a), written input, p. 20. The Finnish Tax Authority (2025).

vulnerable¹¹⁸. The protection of journalists covering demonstrations has been strengthened with closer cooperation between law enforcement and the Union of Journalists¹¹⁹. In July 2025, the Helsinki Court of Appeal convicted two journalists for the disclosure and attempted disclosure of national secrets, sentencing one to four months of conditional imprisonment and the other to 80 day-fines¹²⁰. Some stakeholders expressed concern over the convictions' chilling effect on press freedom¹²¹.

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

The lawmaking process remains overall inclusive, though stakeholders continue to identify areas for improvement. The updated governmental guidelines on stakeholder engagement in legislative drafting adopted in August 2025 include more detailed guidance throughout all stages of the legislative drafting process¹²². However, stakeholders continue to note challenges regarding the practical implementation¹²³, such as shortened consultation timelines, difficulty of assessing the cumulative impact of proposals, incomplete reporting of stakeholder feedback and summaries of proposals not capturing all the amendments included in the draft legislation¹²⁴. The Chancellor of Justice highlighted the need to follow the rules on consultation times¹²⁵. At the same time, business representatives continue to view the lawmaking process as largely transparent and inclusive¹²⁶, and some stakeholders note positive practices such as the Finnish Council of Regulatory Impact Analysis, which is seen to bring additional analytical value to the legislative process¹²⁷.

More than two thirds of companies surveyed in Finland express confidence in the effectiveness of investment protection. 81% of companies are very or fairly confident that investments are protected by law and courts, a figure which has slightly increased in comparison with 2025 (79%)¹²⁸. As regards authorities relevant for economic operators, 83% of companies perceive the level of independence of the national competition authority (the Finnish Competition and Consumer Authority) as very or fairly good, a figure which has slightly increased in comparison with 2025 (82%)¹²⁹. The Supreme Administrative Court has jurisdiction in several business-related cases, including in cases related to public procurement, public concessions, public contracts and economic regulation. A number of

¹¹⁸ Country visit Finland, Council of Mass Media.

¹¹⁹ Finnish Government (2026a), written input, p. 19; Union of Journalists in Finland (2026), written input, p. 17.

¹²⁰ Finnish Government (2026a), written input, p. 20.

¹²¹ Union of Journalists in Finland (2026), p. 16; International Press Institute (2026), written input, p. 20; Amnesty International (2026), p. 17.

¹²² Finnish Government (2026a), written input, p. 20.

¹²³ Country visit Finland, Human Rights Centre, Chancellor of Justice, Parliamentary Ombudsman, Amnesty International Finland and Demla.

¹²⁴ Country visit Finland, Human Rights Centre, Amnesty International Finland, Chancellor of Justice and Demla. European Network of National Human Rights Institutions (2026).
Chancellor of Justice (2026).

¹²⁶ Country visit Finland, Confederation of Finnish Industries and Federation of Finnish Enterprises. OECD Better Regulation Practices in the European Union (2025) ranks Finland above EU average in stakeholder engagement.

¹²⁷ Country visit Finland, Confederation of Finnish Industries, Finland Chamber of Commerce and Human Rights Centre.

¹²⁸ Figures 52 and 53, 2026 EU Justice Scoreboard. 9% and 7% of the surveyed investors respectively perceive concerns about quality, efficiency or independence of justice and frequent changes in legislation or concerns about the quality of the law-making process as a reason for the lack of confidence in investment protection.

¹²⁹ Figure 60, 2026 EU Justice Scoreboard.

judicial mechanisms to improve efficiency are available in these cases, including the possibility to apply interim measures, joint examination of similar cases and the consolidation of multiple appeals¹³⁰.

On 1 January 2026, Finland had 1 leading judgment of the European Court of Human Rights pending implementation, the same as the previous year¹³¹. Finland did not have any leading judgments from the past 10 years pending implementation¹³². The only leading judgment, pending implementation for more than 11 years, concerns the violation of the right not to be punished twice¹³³. As regards the respect of payment deadlines, on 31 December 2025 there were no cases awaiting confirmation of payments (same as in 2024)¹³⁴. By 17 June 2026, the number of leading judgments pending implementation had increased to 2¹³⁵.

The civic space continues to be considered open, while some stakeholders still highlight challenges with regard to funding. The civic space in Finland continues to be considered 'open' by Civicus¹³⁶. The National Action Plan on Fundamental and Human Rights (2024-2027) was adopted in November 2025¹³⁷, and was overall welcomed by stakeholders, despite its delayed adoption¹³⁸. Stakeholders continue to report challenges regarding the Government's austerity measures affecting civil society¹³⁹, as well as a more negative narrative on the role of civil society¹⁴⁰. While retaining its A-status accreditation in 2025¹⁴¹, the National Human Rights Institution faced an unexpected budget reduction instead of the anticipated increase¹⁴², with further cuts projected for 2026 creating uncertainties for planning activities¹⁴³.

¹³⁰ Figures 66 and 67, 2026 EU Justice Scoreboard. The data presented reflects exclusively the mechanisms in place at the level of the highest administrative jurisdictions; the same or other mechanisms may be in place at lower instance administrative courts.

¹³¹ For an explanation of the supervision process, see the [website](#) of the Council of Europe.

¹³² All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2026. EIN (2026), written input, p. 3-4.

¹³³ Judgment of the ECtHR, 11828/11, *Nykanen v. Finland*, pending implementation since 2014.

¹³⁴ Council of Europe (2026), p. 163.

¹³⁵ Data according to the online database of the Council of Europe (HUDOC).

¹³⁶ Finland's score is 89/100. Ratings by Civicus are on a five-category scale defined as: open, narrowed, obstructed, repressed, and closed.

¹³⁷ Finnish Government (2025b). The National Action Plan on Fundamental and Human Rights aims to strengthen the core structures of the rule of law and to promote the realisation of fundamental and human rights in Finland. It also seeks to increase knowledge of the rule of law and the connection between fundamental and human rights and the rule of law.

¹³⁸ Country visit Finland, Human Rights Centre and Amnesty International Finland.

¹³⁹ Country visit Finland, Human Rights Centre, Amnesty International Finland and Demla. European Union Agency for Fundamental Rights (2026), pp. 122-123. European Network of National Human Rights Institutions (2026).

¹⁴⁰ Country visit Finland, Amnesty International Finland and Demla. European Network of National Human Rights Institutions (2026). European Civic Forum (2026).

¹⁴¹ Global Alliance of National Human Rights Institutions (2025). The Finnish National Human Rights Institution is formed by the Human Rights Centre, its Human Rights Delegation and the Office of the Parliamentary Ombudsman.

¹⁴² 2025 Rule of Law Report, Finland, p. 16. European Network of National Human Rights Institutions (2026).

¹⁴³ Country visit Finland, Human Rights Centre. European Network of National Human Rights Institutions (2026).

Annex I: List of sources in alphabetical order*

* The list of contributions received in the context of the consultation for the 2026 Rule of Law Report can be found at https://commission.europa.eu/publications/2026-rule-law-report-targeted-stakeholder-consultation_en.

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Annex II: Country visit to Finland

The Commission services held virtual meetings in February and March 2026 with:

- Amnesty International Finland
- Anti-corruption Cooperation Network
- Chancellor of Justice
- Confederation of Finnish Industries
- Council for Mass Media in Finland
- Demla
- Federation of Finnish Enterprises
- Financial Intelligence Unit
- Finland Chamber of Commerce
- Finnish Association of Judges
- Finnish Bar Association
- Finnish Competition and Consumer Authority
- Finnish Media Association
- Human Rights Centre
- Ministry of Finance
- Ministry of the Interior
- Ministry of Justice
- Ministry of Transport and Communications
- National Audiovisual Institute
- National Bureau of Investigation
- National Courts Administration
- National Police Board
- National Prosecution Authority
- Parliamentary Constitutional Law Committee
- Parliamentary Ombudsman
- Prime Minister's Office
- Supreme Administrative Court
- Supreme Court
- Traficom
- Transparency International Finland
- Union of Finnish Journalists
- Yleisradio Oy

* The Commission also met the following organisations in a number of horizontal meetings:

- Civil Liberties Union for Europe
- Civil Society Europe
- End FGM EU
- European Civic Forum
- European Partnership for Democracy
- Human Rights Watch
- ILGA-Europe

- International Federation for Human Rights
- Philea - Philanthropy Europe Association
- Transparency International EU