

## EuroPAM in-law indicators on Conflict of Interest Restrictions

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EuroPAM is a primary data collection effort that produces assessments of in-law and in-practice efforts to enhance the transparency of public administration and the accountability of public officials. It is part of an EU-funded digital whistleblowing project (DIGIWHIST) that aims to improve trust in governments and efficiency of public spending across Europe.

Conflict of interest refers to a situation in which an individual is in a position to exploit an official capacity for personal benefit, but has not done so yet. In short, the presence of a conflict of interest is not an indicator of improper conduct, but rather a warning of its possibility. Conflict of interest restrictions prohibit public officials from participating in any number of activities that may be seen to compromise their impartiality. The operating principle of a conflict of interest system is to assist public officials in avoiding situations where a conflict of interest can arise.

Conflict of Interest Restrictions	
Qual-1	<b>Head of State</b>
Qual-2	<b>Restrictions</b>
Qual-3	General restriction on conflict of interest
Qual-4	Accepting gifts
Qual-5	Private firm ownership and/or stock holdings
Qual-6	Ownership of state-owned enterprises (SOEs)
Qual-7	Holding government contracts
Qual-8	Board member, advisor, or company officer of private firm
Qual-9	Post-employment
Qual-10	Simultaneously holding policy-making position and policy-executing position
Qual-11	Participating in official decision-making processes that affect private interests
Qual-12	Assisting family or friends in obtaining employment in public sector
Qual-13	<b>Sanctions</b>
Qual-14	Fines are stipulated for violations of COI regulations restricting behavior
Qual-15	Administrative sanctions are stipulated for violations of COI regulations restricting behavior
Qual-16	Penal sanctions are stipulated for violations of COI regulations restricting behavior
Qual-17	<b>Monitoring and Oversight</b>
Qual-18	Monitoring body specified (guidance, training, data tracking)
Qual-19	Enforcement body specified (sanctions, hearings)
Qual-20	<b>Ministers</b>
Qual-21	<b>Restrictions</b>
Qual-22	General restriction on conflict of interest
Qual-23	Accepting gifts
Qual-24	Private firm ownership and/or stock holdings
Qual-25	Ownership of state-owned enterprises (SOEs)

Qual-26	Holding government contracts
Qual-27	Board member, advisor, or company officer of private firm
Qual-28	Post-employment
Qual-29	Simultaneously holding policy-making position and policy-executing position
Qual-30	Participating in official decision-making processes that affect private interests
Qual-31	Assisting family or friends in obtaining employment in public sector
Qual-32	<b>Sanctions</b>
Qual-33	Fines are stipulated for violations of COI regulations restricting behavior
Qual-34	Administrative sanctions are stipulated for violations of COI regulations restricting behavior
Qual-35	Penal sanctions are stipulated for violations of COI regulations restricting behavior
Qual-36	<b>Monitoring and Oversight</b>
Qual-37	Monitoring body specified (guidance, training, data tracking)
Qual-38	Enforcement body specified (sanctions, hearings)
Qual-39	<b>Members of Parliament</b>
Qual-40	<b>Restrictions</b>
Qual-41	General restriction on conflict of interest
Qual-42	Accepting gifts
Qual-43	Private firm ownership and/or stock holdings
Qual-44	Ownership of state-owned enterprises (SOEs)
Qual-45	Holding government contracts
Qual-46	Board member, advisor, or company officer of private firm
Qual-47	Post-employment
Qual-48	Simultaneously holding policy-making position and policy-executing position
Qual-49	Participating in official decision-making processes that affect private interests
Qual-50	Assisting family or friends in obtaining employment in public sector
Qual-51	<b>Sanctions</b>
Qual-52	Fines are stipulated for violations of COI regulations restricting behavior
Qual-53	Administrative sanctions are stipulated for violations of COI regulations restricting behavior
Qual-54	Penal sanctions are stipulated for violations of COI regulations restricting behavior
Qual-55	<b>Monitoring and Oversight</b>
Qual-56	Monitoring body specified (guidance, training, data tracking)
Qual-57	Enforcement body specified (sanctions, hearings)
Qual-58	<b>Civil servants</b>
Qual-59	<b>Restrictions</b>
Qual-60	General restriction on conflict of interest
Qual-61	Accepting gifts
Qual-62	Private firm ownership and/or stock holdings
Qual-63	Ownership of state-owned enterprises (SOEs)
Qual-64	Holding government contracts

Qual-65	Board member, advisor, or company officer of private firm
Qual-66	Post-employment
Qual-67	Simultaneously holding policy-making position and policy-executing position
Qual-68	Participating in official decision-making processes that affect private interests
Qual-69	Assisting family or friends in obtaining employment in public sector
Qual-70	<b>Sanctions</b>
Qual-71	Fines are stipulated for violations of COI regulations restricting behavior
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Qual-73	Penal sanctions are stipulated for violations of COI regulations restricting behavior
Qual-74	<b>Monitoring and Oversight</b>
Qual-75	Monitoring body specified (guidance, training, data tracking)
Qual-76	Enforcement body specified (sanctions, hearings)