

**European Rule of Law Mechanism: input from Hungary**  
**2026 Rule of Law Report**

**Template for input**

*This template for input indicates the type of contribution sought from Member States for the 2026 Rule of Law Report and provides a suggested format of reply. However, Member States are free to decide on the precise format of their contribution, as long as the key points are covered.*

**(1) Information on developments and measures taken to implement each of the recommendations addressed to your Member State in the 2025 Rule of Law Report**

*In the below box, please describe relevant developments and the measures taken with a view to implement the recommendations, following the order of the recommendations as they were addressed to your Member State in the 2025 Rule of Law Report.*

**(2) Information on:**

**a. developments that are relevant for updating and following up on the assessment of the topics covered in the respective country chapter of the 2025 Report, including possible clarifications**

- *In the boxes below, describe developments (updates or feedback) related to the topics covered in your country chapter of the 2025 Report (if not already covered under point (1)). You are invited to follow the order of topics as presented in the country chapter and insert direct references to the country chapter text, if convenient; and*

**b. any other new developments not already covered under points (1) and (2)a. that you consider relevant**

- *The list of topics provided **in the Annex** can provide guidance for this input.*

**General remark concerning clarifications on the Hungarian chapter of the 2025 Report: Hungary maintains the factual comments on and the related explanations to the draft Hungarian chapter of the 2025 Report. In the present input only a few new comments aimed at providing follow-up are included, or previously made comments are emphasized.**

**I. Justice Systems**

Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)

As it was already reported in the input provided for the 2025 Rule of Law Report, an amendment to the Fundamental Law of Hungary and to Act CLXIV of 2011 *on the Status of*

*the Prosecutor General, Prosecutors and other Prosecution Employees and the Prosecution Career*, which entered into force on January 2025, provides that the Prosecutor General shall be elected by the National Assembly (hereinafter: Parliament) not only from among prosecutors. However, regarding his/her qualification and clean criminal record, the same requirements shall apply to the Prosecutor General as to any other prosecutors, even if he/she was not a prosecutor prior to his/her election. In June 2025, the Parliament elected a new Prosecutor General from among the prosecutors.

Irremovability of judges; including transfers (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

Ensuring that judges, prosecutors, and notaries can continue to practice their profession until the age of 70, beyond the retirement age: in connection with improving the efficiency of justice, Act XLIX of 2025 *on the amendment of judicial acts* (hereinafter: Act XLIX of 2025) includes, among other things, the possibility of continuing to practice their profession until the age of 70 after reaching the retirement age. In recent years, there have been several proposals to amend the provisions on the termination of service in the judicial profession. It is an important policy objective that the possibility of continued employment after reaching the general retirement age should ensure that the accumulated specialized knowledge is not lost, but can continue to enrich the practice of law. It is justified to create the conditions for this in relation to judges, prosecutors and civil law notaries. With regard to judges, requests for continued employment shall be approved without substantive review by the President of the National Office for the Judiciary (hereinafter: NOJ) in the case of judges and by the President of the Kúria (supreme court of Hungary) in the case of judges of the Kúria. The request may only be rejected if it is submitted too early or too late (in less than a year before reaching 65 years of age). In the case of prosecutors, the request has to be submitted to the Prosecutor General, who gives permission for the continued employment or refuses the request (for the same reasons as in the case of judges). These provisions entered into force on 1 January 2026.

Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary): the effective exercise of the powers of the National Judicial Council

The basic rules governing the functioning of the NJC are laid down in Act CLXI of 2011 *on the Organisation and Administration of Courts* (hereinafter: Court Administration Act). As it was reported earlier, Act X of 2023 *amending, with regard to the Hungarian Recovery and Resilience Plan, certain Acts governing justice* (hereinafter: Act X of 2023) included, several amendments aimed at strengthening the role of the NJC.

The annual meeting plan of the NJC and the summary of the meeting shall be published on its central website<sup>1</sup>, as well as the minutes of the preliminary expression of opinion on the candidate for the position of President of the Kúria and President of the NOJ.

In general, it can be said that the relationship between the NOJ and the NJC is a dialogue-based cooperation based on normative foundations regulated the Court Administration Act. The NJC effectively exercises its powers in relation to the President of the NOJ, which have been extended and strengthened as of 1 June 2023.

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<sup>1</sup> See at the following link: <https://obt-jud.hu/en>.

In the areas within its sphere of agreement and opinion in the field of the central administration of the courts, the NJC received the proposals of the President of the NOJ in 2025 as well.

In the field of general central administration, the NJC has always commented on the regulations and recommendations issued by the President of the NOJ, and has supported them in all cases without supplementation; did not make a signal to the President of the NOJ.

In the area of the budget, the NJC in 2025 supported the proposal for the 2026 budget of the courts and the report on the implementation of the 2024 budget. In all cases, the NJC agreed with the proposals of the President of the NOJ containing the rules on the detailed conditions and amount of other benefits provided to judges and court leaders.

The NJC agreed with the decision of the President of the NOJ to review the development of the workload and national case flow data, as well as to determine the average national workload of litigious and non-litigious proceedings by court level and case department. It is necessary to emphasize that the NOJ modified the methodology it had previously developed in accordance with the recommendations of the NJC. In all cases, the NJC also agreed with the decision of the President of the NOJ to determine the necessary number of judges and judicial staff at each court.

The NJC also actively and efficiently exercised its new powers in the field of personnel matters, where the proposals of the President of the NOJ are made in greater numbers:

- in some cases, the NJC did not agree with the proposal, when the President of the NOJ wished to fill the position of judge with the candidate in the second or third place in the ranking,
- the NJC did not consent to the reappointment of the president of the district court against the proposal of the president of the NOJ, as the president had already held the same office twice,
- the NJC took note of the information provided by the President of the NOJ on the practice of judging applications for judges and court leaders in 2024 without comment,
- on the initiative of the President of the NOJ, the NJC decided on the awarding of titles in several cases,
- in each case, the NJC received the proposals from the President of the NOJ on the basis of which it had to decide on the determination of the period of exemption of judges or, in the case of resignation, on the issue of exemption from the obligation to work,
- there were cases when, despite the proposal of the President of the NOJ, the NJC did not agree with the assignment of a judge to another relevant body,
- in the overwhelming majority of the cases the NJC agreed with the appointment of judges to another court, but on one occasion it only partially agreed,
- regarding the decision of the President of the NOJ declaring the application for a judicial position unsuccessful, if at least one applicant who had submitted a valid application and was ranked by the Judicial Council and who had submitted a valid application that met the conditions of the application was unsuccessful, the NJC disagreed in two cases.

In exercising its powers in the field of training, the NJC agreed with the central education plan proposed by the President of the NOJ.

The NJC accepted three reports without comment on the half-year activities of the President of the NOJ (first and second half-year 2024, first half-year 2025), and did not define any new

elements in 2025 in connection with the structure of the report.

In 2025, the NJC requested access to documents on three occasions in order to get acquainted with the proposals and comments received from the courts in connection with certain bills and regulations. All request were allowed by the President of the NOJ.

In 2025, the NJC did not file any default or other lawsuits against the NOJ.

Although the President of the NOJ has no legal obligation to do so, he publishes the decisions of the NJC in the Court Gazette in order to ensure the widest possible publicity.

Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

The disciplinary liability of judges, the disciplinary procedure, and the range of disciplinary sanctions are governed by Chapter VIII of Act CLXII of 2011 *on the Legal Status and Remuneration of Judges* (hereinafter: Legal Status Act). Disciplinary cases are adjudicated by service courts. Since the amendments to the Legal Status Act that entered into force on 19 February 2025, no further changes have occurred.

In the case of a judge of the Kúria who commits a disciplinary offence, in lieu of a demotion by one salary grade, a reduction of remuneration for a maximum period of one year may be imposed, and in lieu of a demotion by two salary grades, a reduction of remuneration for a maximum period of two years may be imposed, subject to the condition that the reduction may not exceed 5% of the judge's remuneration. In line with this amendment, Section 126(1) of the Legal Status Act, which governs the temporal effect of disciplinary sanctions, has been supplemented to include the concept of remuneration reduction applicable to judges of the Kúria.

Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

i) The Commission found in the Hungarian chapter of the 2024 Rule of Law Report that the 2023 reform had further improved the transparency of the case allocation system of the Kúria. As of February 2024, the Kúria has been publishing weekly log files on its website with expanded content, allowing for a more precise verification of whether the rules on case allocation have been properly applied. Building on this, the 2025 Rule of Law Report explicitly refers to the Kúria as a positive example, noting that its predetermined and automated case allocation system functions well and that no complaints have been submitted by parties regarding the practice of case allocation.

In a unique manner, the exact hour and minute of a case's arrival, registration and allocation must be published, together with the name and position of the person responsible for case allocation and the composition of the judicial panel hearing the case, that is, the names of the judges. It must also be indicated whether the allocation departed from the case allocation rules and, if so, on what grounds (with reference to the relevant legal provision).

Recording the composition of the panel can present difficulties particularly when, during the proceedings, a judge falls ill or must be replaced for another reason, resulting in a decision being taken by a different composition. Nevertheless, every change must be strictly recorded so that the parties can verify compliance with the rules.

The Kúria operates one of the most transparent case allocation systems that can serve as best

practice in the EU.

ii) For the general public – media, opinion leaders – judicial independence is often seen from the point of view of the overall performance of the courts. What affects most the perception of the general public is what information it has on the everyday work of judges – if the public presumes judges work slowly and most of their judgements are overturned, then the general perception is critical. In the past 3 years, the number of “old cases” (cases pending for more than 2 years) has decreased radically (approx. 45%), and so the number of cases pending for more than 5 years. Among the pending cases, the overall ratio of the “old cases” is around 5%, while the ratio of the cases above 5 years is around 0,6%. Although there are still challenges – mostly on the first instance – to reduce the time needed to resolve a case, more than 90% of the civil cases on the district level are finished within 1 year.

Digitalization has become part of the court’s everyday activity – this also made the courts more accessible to the citizens which may have positive impact on the perception of the general public.

Due to certain macroeconomic factors (inflation) in 2024, the value of the remuneration of judges and court staff personnel has become an important topic. In this regard see above the information provided on the increase of remuneration of judges, judicial staff, prosecutors and non-prosecutor prosecutorial staff.

#### Accessibility of courts (e.g. court/legal fees, legal aid, language)

The procedural fee for initiating court proceedings in Hungary was one of the lowest in Europe, and Hungarian legislation allowed the use of digital technologies in civil, commercial, administrative and criminal cases in a wider range than in many other legal systems in Europe. In terms of public online access to judgments, Hungary was also among the most successful European states.

It should also be noted that anonymisation is partially automated, which significantly facilitates the process. Due to data protection requirements, human approval is still needed before publication, yet the system remains exceptionally fast.

#### Resources of the judiciary (human/financial/material ), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

The budget of the court system is adopted by the Parliament. The budget of the court system for the year 2025 was 192152.5 million HUF (for the year 2023 it was 153836.3 million HUF; while for the year 2024 was 155662.4 million HUF).

Similarly to the information provided for the 2025 Rule of Law Report, the court system currently has approx. 11300 employees: approx. 2700 judges and approx. 8600 judicial employees (including trainee judges, court secretaries and other judicial employees). The ratio of female judges is 69% and that of male judges is 31%.

Court buildings are mostly owned by the state with a few exceptions (rentals). The court system uses 187 buildings, 156 of them have judicial functions (the others are training facilities, record offices, finance offices, archives etc.)

Remuneration of judges and judicial staff, as well as prosecutors and non-prosecutor prosecutorial staff

As already mentioned in the written input provided for the 2025 Rule of Law Report, the remuneration of judges and judicial staff, as well as prosecutors and non-prosecutor prosecutorial staff, will be increased in three stages between 1 January 2025 and 1 January 2027. As a result, by 1 January 2027, the average income compared to the 2024 base will reach a gross monthly amount of HUF 2250000 for judges and prosecutors; for junior judges and trainee judges, as well as deputy prosecutors and trainee prosecutors, it will reach a gross monthly amount of HUF 1125000; and for other judicial employees and non-prosecutor employees of the prosecutor's office, it will reach a gross monthly amount of HUF 850000. Within this framework, as the second phase of the salary increase, from 1 January 2026

- the salary base for judges and prosecutors will increase by 10%, from HUF 651660 to HUF 716830;
- in the case of junior judges, trainee judges, assistant prosecutors, and trainee prosecutors, the lower and upper limits of the multiplier corresponding to their pay grade will be increased by 0.18, and
- in the case of other judicial employees and other non-prosecutor employees of the prosecutor's office, the necessary increase (calculated taking into account the 10% salary base increase and an additional 0.18 increase in the lower and upper limits of the multipliers) will be provided.

The availability of court staff in the central region

The fundamental rules of the service relationship of judicial employees are governed by Act LXVIII of 1997 *on the service relationship of judicial employees* (hereinafter: Judicial Employees Act). The Judicial Employees Act lays down rules on the secondment of judicial employees (in Article 42), pursuant to which, in exceptional cases, a judicial employee may be required to perform work appropriate to his or her qualifications but not falling within his or her duties (substitution) or to work for another judicial body (secondment). Substitution and secondment shall not result in disproportionate harm to the judicial employee, taking into account his/her position, education, age, state of health and family circumstances. The law also contains provisions on the duration of secondment and remuneration.

From the point of view of judicial administration, the central region of Hungary is considered to be the Metropolitan Court of Appeal, the Metropolitan Court of Budapest and the Budapest Environs Regional Court, as well as the district courts operating within their jurisdiction.

The number of authorized judicial staff of the regional courts of appeal and regional courts is determined annually by the President of the NOJ with the agreement of the NJC. The presidents are entitled to determine the number of judicial staff in the courts under their administration and in the lower, district courts within the framework of the budget allocated to them and the headcount decision of the President of the NOJ.

The challenges facing the central region in recent years have mainly arisen in the field of judicial employees assisting judicial activities – officials, clerks – and the turnover of employees involved in adjudication – court secretaries, trainee judges and court clerks – has been to a lesser extent. The management of the problems that arose was primarily the task and responsibility of the court presidents; the President of the NOJ did not substantially change the number of authorized judicial staff of the three courts in the central region

between 2023 and 2025. The problem was not the lack of positions but the lack of applicants to these positions.

Changes in the number of authorized judicial staff in the central region by courts between 2023 and 2025:

Metropolitan Court of Appeal:

On 31 December 2023: 147 people, of which 54 were clerks

On 31 December 2024: 147 people, of which 54 were clerks

On 31 December 2025: 147 people, of which 54 were clerks

Budapest Environs Regional Court:

On 31 December 2023: 755 people, of which 431 were clerks

On 31 December 2024: 754 people, of which 431 were clerks

On 31 December 2025: 754 people, of whom 431 were clerks

Metropolitan Court of Budapest:

On 31 December 2023: 2158 people, of which 1238 were clerks

On 31 December 2024: 2158 people, of which 1238 were clerks

On 31 December 2025: 2158 people, of which 1238 were clerks.

The number of people actually in a judicial service relationship – including those in senior positions – was different in the three organisations, and in the case of the Metropolitan Court of Appeal, it essentially corresponded to the authorized number of staff; at the Budapest Environs Regional Court, overfilling was typical (the actual number of staff exceeded the permitted headcount), while in the case of the Metropolitan Court, the number of judicial employees was actually 250-350 fewer than the authorized number.

Actual number of judicial staff between 2023 and 2025:

Metropolitan Court of Appeal:

On 31 December 2023: 143 people, of which 100 were clerks

On 31 December 2024: 141 people, of which 101 were clerks

On 31 December 2025: 144 people, of which 103 were clerks

Budapest Environs Regional Court:

On 31 December 2023: 783 people, of which 597 were clerks

On 31 December 2024: 782 people, of which 601 were clerks

On 31 December 2025: 782 people, of whom 605 were clerks

Metropolitan Court of Budapest:

On 31 December 2023: 1961 people, of which 1465 were clerks

On 31 December 2024: 1810 people, of which 1405 were clerks

On 31 December 2025: 1870 people, of which 1452 were clerks.

The fluctuation of the number of judicial employees during the year was not significant at the Metropolitan Court of Appeal: the legal relationship of 13 people was terminated in 2024 and 19 in 2025.

In 2024, a total of 110 employees left the Budapest Environs Regional Court, 69 of whom were officials or clerks. In 2025, the legal relationship of 72 employees were terminated, of which 49 were officials or clerks.

In the case of the Metropolitan Court, the number of judicial employees leaving in 2024 was 273, of which 154 were officials or clerks. In 2025, the legal relationship of 164 people were terminated, of whom 101 were officials or clerks.

Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

The responsibility for the training of the Hungarian judges and judicial employees is divided between the Hungarian Academy of Justice (hereinafter: Academy) and the courts themselves. The Academy is part of the NOJ. The Academy organizes legal and “soft skill” trainings on a national level. In addition, each regional court and regional court of appeal organizes its own decentralized trainings for its judges and judicial employees.

For trainee judges, during their three-year traineeship, the court, where they work, organizes regular training courses that cover all the relevant legal fields. For court secretaries, the Academy organizes preparation trainings for the judicial work (ethics and integrity, criminal law, civil law and mock trials).

Part of training courses are mandatory for judges; others are open for those who are interested. These courses take place at the Academy.

Providing on-line trainings has been a part of the training regime for more than a decade. Both the importance and the number of these trainings is growing.

Training of justice professionals at the Kúria is closely linked to judicial practice and research activities. A central role is played by the Judge Royal Werbőczy István Research Institute, which supports continuous professional development through research-based training, internal seminars, and thematic conferences. Judges, chief advisors, and court staff participate in regular professional forums addressing current issues in criminal, civil, administrative, tax, and local government law. These events promote the exchange of experience across chambers and contribute to the consistent application of law. Chief advisors, many of whom hold PhD degrees and are active academics, contribute to training by preparing analytical materials, participating in panel work, and delivering lectures reflecting on adjudicative practice. In addition, the Research Institute organizes targeted training and research projects on constitutionally significant areas, such as electoral judicial review and judicial independence, often in an international and comparative framework. These activities ensure that training at the Kúria combines practical adjudicative needs with up-to-date doctrinal and comparative legal knowledge.

The Commissioner for Fundamental Rights (hereinafter: CFR) and the Office of the Commissioner for Fundamental Rights (hereinafter: OCFR or Office) attach primary importance to the development of the fundamental rights knowledge of professionals working in the justice system and in the public administration in order to ensure that fundamental rights are consistently upheld during the application of law. The activity of the Office does not operate as a formal training system but is instead built on practical, experiential, and attitude-forming elements that can be utilized in practice.

The OCFR regularly fulfill requests from judicial bodies, professional boards, and institutions. Within the framework of such collaborations, the Office participates in events and consultations of a professional-training nature, for example, by responding to the requests of the NJC.

Particular emphasis is placed on those areas that directly affect the access to justice of vulnerable groups – such as persons living with disabilities – and ensuring the accessibility of procedures, as well as the enforcement of equal treatment in judicial and administrative practice. The Office remains open to professional requests and collaborations in the future

and strives to assist actors in the public administration and the justice system with professional support and advice from a fundamental rights perspective.

Through its awareness raising activities, the OCFR participates in organizing training courses provided by the National Police Headquarters for law enforcement personnel, sharing its investigative experiences and professional observations with police officers. These occasions also provide an opportunity for police officers to share their professional views with the staff of the Office. As a part of this effort, the staff of the Office prepare thematic training courses for police officers on an annual basis.

In 2025, the focus was on school guards and the fundamental rights requirements for police measures. Monitoring school guards is also one of the tasks of the CFR, so it is particularly welcome that regular professional consultations provide an opportunity for the further training of school guards, thereby strengthening the enforcement of children's rights in educational institutions. One notable example of this was participation in professional training on the specificities of treating children with special developmental needs.

The CFR intends to contribute to the discussion of issues affecting the field of fundamental rights through substantive dialogue, both to date and in the future, by means of thematic events and experience-sharing forums. An example of an experience-sharing and discussion-initiating event is the conference titled "Freedom of Expression versus Human Dignity – Dilemmas of our Coarsening Public Discourse" organised on 10 December 2025, by the CFR and the President of the National Authority for Data Protection and Freedom of Information, where participants debated the issue of the freedom of expression and the protection of human dignity within the framework of a roundtable discussion, highlighting problems appearing in the virtual space.<sup>2</sup>

Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)

Detailed data has been provided in the framework of the EU Justice Scoreboard.

### Courts

Act XLIX of 2025 sets the goal of ensuring that the working conditions and circumstances of judges and judicial staff meet modern expectations and that citizens' trust in jurisdiction increases. In order to achieve these objectives, Act XLIX of 2025 expands the possibility of online presence in hearings for participants of the hearings, the audience, and law students.

In this regard, it should be recalled that Article XXVI of the Fundamental Law of Hungary stipulates that the state shall strive to apply new technical solutions and scientific achievements in order to improve the efficiency of its operations, raise the standard of public services, increase the transparency of public affairs, and promote equality of opportunity.

In connection with the conduct of court proceedings, there is a significant demand from both the justice-seeking public and the legal profession for the expansion of electronic and telecommunications options, the successful operation of which has been confirmed by the positive experiences of electronic hearings introduced during the COVID pandemic.

These needs therefore justify making court hearings public online using the available

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<sup>2</sup> See at: <https://www.ajbh.hu/-/2670755-304>.

technical and IT tools, in order to increase the transparency of court proceedings and thus social control of legality in line with the technological possibilities of the age. This means that the audience can also participate in the hearing via an online platform. At the same time, making hearings available online not only serves to enhance social control, but can also play a significant role in modernizing legal education and scientific research. Modern technological tools enable students studying law or political science, as well as teachers and researchers in these fields, to directly participate in following the proceedings online.

### *The Prosecution Service*

The Prosecution Service of Hungary operates a nationwide data transmission network covering all of its locations. In order to ensure an appropriate standard of electronic administration and internal IT services, as well as seamless electronic communication with partner organizations, the prosecution service continuously develops this network. The IT services of the prosecution service include internet access, electronic mail enabling rapid information exchange, and access to databases and registers – both those developed by the prosecution service and by external developers – that support prosecutorial work. Prosecutorial employees access the network in accordance with their authorizations, which continuously provides online access to the applications and data necessary for their work. Prosecutors are provided with tools that support both office-based prosecutorial work and activities outside the office, subject to appropriate security measures; using portable computers, they can access the prosecution service's IT network and its services in courtrooms, at external locations, or even from their homes. A key development priority is the full integration of the prosecution service into the IT-based data flow prescribed by legislation, the reduction of administrative workload, and ensuring the broadest possible accessibility of work-supporting registers.

In addition to access to the registry systems operated by the Ministry of the Interior, the Hungarian Prison Service Headquarters, the Ministry of Justice, the National Police Headquarters, and IdomSoft Informatikai Zrt., as well as to the Central Media Repository („Központi Médiatár”), the Central Evidence Registry System („Központi Bűnjelnyilvántartó Rendszer”), the ePostal Registry („ePostakönyv”), the second generation of the Schengen Information System (SIS II), and the Client Document Access System of the NOJ, the prosecution service has also, through its own development activities, established access to the “For the Protection of Our Children” System, as well as to the “Civil Query System” and the “Register of Wards”.

With the help of all these systems, authorized users of the prosecution service – within a defined scope, on the basis of cooperation agreements supplementing statutory provisions, and with individual responsibility – may access the electronic files of investigative authorities and criminal courts. Naturally, they also have access to all public IT services and registers through which the – typically anonymized – judgments published by the judicial organization for the general public can be consulted.

Currently, the prosecution service does not yet use artificial intelligence (AI) based tools, but discussions are ongoing regarding proposals to determine the optimal areas for the use of AI in the prosecution.

Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

Colleagues working in almost all professional branches and fields of the prosecution service use various electronic information systems, the operational characteristics of which are tailored to the specific work practices and work organization of the given field (so-called case management or CMS systems). These specialized systems are complemented by electronic information systems that specifically implement and support the prosecution service's external and internal electronic communication. In order to renew and integrate these systems, the development and implementation of a new, proprietary, integrated records and document management system – also performing case management/CMS functions – is currently underway. This system will make it possible to replace older systems and to standardize the processes established across the various professional branches and fields.

Almost all prosecutorial systems are capable of collecting data related to their operation according to defined criteria, on the basis of which reports can be prepared that describe the functioning of the prosecution service and that prepare for and support managerial decision-making (professional, administrative, and human resources-related).

Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

Judicial specialisation and continuous training, including in commercial and economic matters, are supported not only through domestic structures but also through regular invitations from international judicial and professional organisations. Judges of the Kúria and other Hungarian courts frequently participate in seminars, conferences, judicial exchanges, and professional forums organised by European and international bodies. These invitations typically originate from organisations such as the European Commission, the Council of Europe (including CEPEJ and CCJE), ACA-Europe, the European Judicial Training Network (EJTN), the European Law Institute (ELI), the European Association of Competition Law Judges (AECLJ), the International Association of Tax Judges (IATJ), the European Union Forum of Judges for the Environment (EUFJE), as well as from supreme and constitutional courts of other states. Participation takes place both in physical and online formats and covers a wide range of specialised fields, including commercial law, competition law, tax law, environmental law, and cross-border private law.

Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

About the availability and application of ICT tools the EU Justice Scoreboard includes detailed data.

Efficiency of the justice system (E.g. Measures as regards length of proceedings, to address backlogs, ...)

*i) Judgment with a summary statement of reasons:* In order to reduce unnecessary administrative burdens and increase the time available for substantive work, it was justified to establish a regulatory framework whereby the proceeding court may deliver a judgment with abbreviated reasoning in civil cases at first instance. Detailed reasoning for the judgment would only be necessary if the parties requested it because they were likely to exercise their right of appeal. Due to the amendment introduced by Act XLIX of 2025, if the parties do not appear at the hearing, or if the party or parties present declare, at the court's

request, that they do not require a detailed written statement of reasons due to the acceptability and persuasiveness of the oral statement of reasons for the judgment, it shall be sufficient for the court to give a brief written statement of reasons for its decision. If either party requests a detailed judgment at the time of the announcement of the judgment, the court shall proceed in accordance with the general rules. However, in the case of the delivery of a judgement with abbreviated reasoning, the parties must, if they wish to exercise their right of appeal, notify the court of their intention to appeal within five working days of the delivery of the judgment, without presenting their reasons, and must also provide proof of payment of the procedural fee. In this case, the trial court shall provide a detailed written statement of reasons for its judgment. If the parties do not notify their intention to appeal within the time limit, the judgment containing the abbreviated reasoning shall become final and the court shall not be required to provide detailed reasoning. Otherwise, the right to legal remedy can be exercised according to the general rules, because the party has access to the judgment containing the detailed reasoning and can submit the detailed grounds for its appeal on that basis, to which the general rules on appeals apply.

*ii) Strengthening the legal unification role of the Kúria:* Act XLIX of 2025 introduced procedural rules in Act CXXX of 2016 *on the Code of Civil Procedure* (hereinafter: Code of Civil Procedure) that are in line with the changed supervisory role of the Kúria, following the example of Act CL of 2016 *on the Code of General Administrative Procedure* (hereinafter: Code of Administrative Procedure). A general trend that can be observed in most Member States of the EU is that the role of the supreme court extends beyond the exercise of powers to protect individual rights to ensuring the uniformity of judgments. National regulations applying this model ensure, in addition to the function of individual legal protection, the unifying function of the supreme court's case law as well, by not making extraordinary appeal proceedings available to the parties as a matter of right, but rather making them subject to authorization by either the appellate court of second instance or the highest court. The legal institution of "selection at the gate" is known in many foreign procedural law models.

The Kúria should ensure effective review following an authorisation assessment that primarily takes into account considerations of legal uniformity. Based on the above, Act XLIX of 2025 defines the scope of reviewable decisions in such a way that, as a general rule, it makes review subject to authorization, but at the same time extends the authorization of review – which, under the current rules, is only possible in certain types of cases – to all cases, thereby providing a realistic chance in each case for the Kúria to take a position on the disputed legal issue. This is justified by the indications of the associated professions, primarily notaries and lawyers, as well as the courts of appeal and regional courts. If certain types of cases, such as substantive decisions in non-contentious proceedings, do not reach the Kúria even on an exceptional basis, then the role of legal uniformity cannot be effectively enforced.

Act XLIX of 2025, based on the fact that the competence rules in the Code of Civil Procedure are based on the regional court model, makes a significant exception to the scope of decisions subject to authorization: it is not necessary to submit an application for authorization if the court of appeal changes the judgment of the regional court, as the court of general first instance, or if the regional court changes the judgment of the district court in cases concerning personal status. In view of the two different decisions, the way is therefore open for the review of the final judgment without an application for authorization. The parties also have a right to initiate a review procedure in cases brought to enforce personal rights and in cases brought to obtain access to data of public interest, where there is a significant public

interest in the use of extraordinary legal remedies in relation to these matters, in order to ensure a uniform legal framework for the protection of personality rights and social publicity.

*iii) The need to comply with procedural time limits, and the simplified procedure:* Improving the efficiency of the administration of justice remains a priority area. The aim is to ensure that litigants obtain final and enforceable decisions in the shortest possible time, bringing their legal disputes to a satisfactory conclusion. The rapid conclusion of procedures also has a positive impact on the performance of the economy, the sooner the outstanding debts of economic operators are recovered, the more effectively they can use their financial resources for their development. In order to achieve these objectives, Act XLIX of 2025 implemented a number of measures. It introduced a new legal instrument, on the basis of which the court shall provide financial compensation to the parties if it exceeds the time limit set by law for taking measures, from the day following the expiry of the time limit. The new legal instrument has been introduced initially in civil proceedings, and then, from 1 July 2026, in administrative proceedings, as well. This financial compensation shall be determined *ex officio* without a separate request and paid to the parties.

We recall that, with the advancement of digitalization and modern technology, there is a growing demand for obtaining quick and substantive decisions in legal disputes. In most EU Member States, there are simplified or expedited types of proceedings that parties can typically use on a voluntary basis and that are suitable for reaching decisions in their legal disputes in an extremely fast manner. In so-called “fast-track” proceedings, the parties’ agreement to settle their dispute quickly overrides the requirement for the full application of procedural guarantees. This deviation from the general rules is justified by the parties’ procedural autonomy.

Taking into account other countries’ good practices as well, Act XLIX of 2025 introduced the simplified civil proceedings. With a few exceptions where the rules of the simplified proceedings do not apply (such as legal disputes concerning personal status, employment relationships, and consumer disputes), the parties themselves may decide to stipulate in their contract that their legal dispute shall be decided by the court in this procedure. In the simplified proceedings, thanks to specific rules, the court delivers its judgment within a short period of time, based on the plaintiff’s statement of claim, the defendant’s statement of defence, any written statements obtained if necessary, and the documentary evidence and expert opinions attached to the statement of claim and to the statement of defence.

*iv) Addressing backlogs:* Measuring the workload of Hungarian courts is based on mainly the number and ratio of incoming - resolved - pending cases, not on the timeframe of the cases. Although generally it can be emphasized that long-term statistics show that 90% of the first instance cases are finished within one year. In the last decade, the courts were able to gradually reduce the backlog by 40%. What is more noticeable, particularly the cases that have been pending for a relatively long time (e.g. 2 years) have been reduced by 45 % from the year 2019, following the introduction of new measures by the president of the NOJ in August 2020 to reduce the number of cases pending for more than two years. The efficiency of the justice system can be monitored also by measuring the ratio of decisions become final in the first instance without appeal. From several years this ratio in civil litigious cases is more than 90%; in penal litigious cases is approx.70%.

#### Other

i) In 2025, a comprehensive report was prepared on the functioning of administrative courts

covering the period between 2017 and 2024. The report examined administrative adjudication along key indicators of judicial efficiency and, at the same time, defined the main directions for further development. Based on this analysis, and in cooperation with the courts and other legal professions, a legislative package was developed related to administrative justice (Act LXXX of 2025). One of the primary objectives of the legislative process was to simplify citizens' access to administrative litigation through deregulatory solutions, as well as to accelerate and streamline the procedural framework itself. In parallel, a key objective was to contribute to the effective functioning of the legal system and to define its strategic development priorities and directions, thereby improving the quality of the justice system and enhancing legal competitiveness.

Within the legislative package, the scope of first-instance cases to be adjudicated by a sole judge and by a court panel was redefined [Section 8(2) of Act I of 2017 *on the Code of Administrative Court Procedure*]. This revision addressed the previously existing inconsistency whereby certain cases of a relatively simple nature were decided by panels, while more complex cases were assigned to a single judge. Under the amended framework, cases falling within the jurisdiction of a single judge are delineated on the basis of characteristics related to the complexity of the case types, such as matters closely affecting individuals, cases involving local governments or district offices, or cases determined by monetary thresholds. Furthermore, clarifications have been made to prevent cases that would otherwise fall within the competence of a single judge from being referred to a panel due to ancillary circumstances (for example consolidated decisions or supervisory proceedings), where such circumstances do not in themselves increase the complexity of the case. As a result of the amendment, the allocation of cases becomes more transparent, thereby simplifying the courts' case assignment procedures.

As a procedural facilitation measure, the content and submission of the statement of claim were simplified for unrepresented natural persons, for this purpose a standardised form was developed for them, on which they may submit their claims [Section 37 (1a) and Section 39 (7)-(9) of Act I of 2017 *on the Code of Administrative Court Procedure*]. In addition, unrepresented natural persons are granted the option to file their statement of claim against actions taken in proceedings conducted by district (capital district) offices or government offices also at government service centres (so-called "government windows"). Accordingly, the scope of supplementary services provided by these government service centres have been expanded to include the forwarding of statements of claim to the authority with the relevant jurisdiction and competence. Similarly, within the framework of so-called "client assistance", statements of claim may be recorded in minutes at district courts during pre-designated office hours, or assistance may be requested in completing the standardised form.

In addition, several provisions were developed that are expressly aimed at accelerating proceedings and enhancing procedural efficiency. These measures share the common objective of reducing the administrative burden on the courts, strengthening procedural concentration, and curbing dilatory litigation practices.

Overall, the legislative package on administrative adjudication is intended to ensure that judicial proceedings do not become an obstacle to the enforcement of rights or a means of undue delay, but instead lead to the substantive resolution of cases in an efficient and predictable manner.

ii) According to the 2025 European Justice Scoreboard, Hungary performed outstandingly in several indicators. Among the EU Member States, Hungary had the most favorable estimated time for conducting civil and commercial trials, and it performed exceptionally

well at all levels in the categories of resolving administrative cases, meaning that procedures were completed within a very short time.

It should be noted that, in civil proceedings, the prompt resolution of disputes is further promoted by the fact that, where the duration of proceedings exceeds the period considered reasonable, the parties to the proceedings may, pursuant to Act XCIV of 2021 *on the enforcement of pecuniary compensation for the excessive length of civil proceedings*, claim an appropriate amount of pecuniary satisfaction. In addition, as from 19 August 2025, under Section 147/A of the Code of Civil Procedure (enacted by Act XLIX of 2025), the parties are automatically entitled to pecuniary satisfaction where the court exceeds the statutory time-limit prescribed for taking procedural measures (see above).

## **II. Anti-Corruption Framework**

List any changes as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO.

### National Protective Service

In Hungary, the fight against corruption is supported by a complex institutional framework involving several actors, within which the National Protective Service (hereinafter: NPS) has played a special role since its establishment. The NPS carries out internal crime prevention and crime detection tasks entrusted to it by law, in relation to law enforcement agencies and other state and public administration bodies, as specified in the applicable legislation.

Over the course of its existence, the range of bodies and personnel with respect to which the NPS is authorized to exercise its statutory powers has undergone multiple changes. The NPS currently performs its legally defined core responsibilities in the areas of law enforcement (police, prison service, immigration office, disaster management authority), public education, and state healthcare institutions, as well as with respect to employees of territorial government administration bodies (government offices) and personnel of other authorities (e.g. Ministry of Interior, Parliamentary Guard, University of Public Service, Directorate-General for Social Inclusion, General Directorate of Social Affairs and Child Protection) who, in accordance with the relevant legislation, belong to the protected staff, since July 2024 also including individuals employed by the child protection system.

As a result of legislative changes – with regard to points 4.13 and 6.5 of the Government Decision No. 1025/2024 (of 14 February 2024) *on the adoption of the medium-term National Anti-Corruption Strategy for the period 2024-2025, as well as the Action Plan for its implementation* – the protected staff was further expanded in 2025: following the amendment of Act XXXIV of 1994 *on the Police* (hereinafter: Act on the Police) with effect of 7 June 2025, all healthcare professionals, workers, or collaborators employed in any legal relationship has fallen under the jurisdiction of the NPS, except for certain exclusions (such as students, general practitioners employed by churches or municipalities, doctors and nurses providing care exclusively to military personnel).

Furthermore, starting from 1 January 2025, the legal mechanism for checking the impeccable lifestyle (lifestyle monitoring) also apply to school guards, who are part of the protected

staff.<sup>3</sup>

The performance of the NPS's duties is further supported by the amendment to Act XC of 2017 *on the Code of Criminal Procedure* (hereinafter: Code of Criminal Procedure), effective from 1 September 2025, which allows for the use of covert means subject to permission of a judge, along with the use of data obtained through such means in cases of active bribery (e.g. in the case of a person offering gratuity payment, irrespective of the applicable penalty range), and abuse of the position of performing public duties.<sup>4</sup>

In December 2025, by the amendment of Government Decree No. 293/2010 (of 22 December) *on the designation of the police agency performing internal crime prevention and detection tasks and the detailed rules of the performance of such tasks*, the lifestyle monitoring and integrity tests, with effect from 9 February 2026,<sup>5</sup> the possibility for applying the NPS's instrumental polygraph testing technique has been extended to enhance the effectiveness of crime prevention and the fight against organized crime. Another aim of this amendment is to ensure that the NPS's cyber intelligence expertise and capabilities to be utilized more effectively and efficiently by other authorized bodies in proceedings requiring specialized knowledge.

In terms of the human, financial, and technical/specialized resources, it may be stated that the NPS is (almost) entirely funded by the central government budget, the resources allocated in the central government budget for 2026 for its balanced operation, as well as the workforce (714 employees as of 31 December 2025), do not indicate any significant or substantial change compared to previous years.

In 2025, adapting to the pace of technological and IT development, the NPS further expanded and upgraded its technical equipment, increased the competitiveness and efficiency of its services providing operational support, thus contributing to the effectiveness of its crime prevention and crime detection activities (for example, expanded the fleet of drones, increased the number of high-resolution IP cameras that can be mounted on vehicles, continuously developed its record-keeping programs and applications). Based on grant contracts entered into force or grant applications submitted in 2025, it plans to implement additional IT developments, as well as public awareness-raising and informational media campaigns, and anti-corruption training, financed by European Union funding sources.

In line with its general objective to establish cooperation with foreign authorities and deepen professional ties with partner organizations from other countries, the NPS further strengthened the framework of its bilateral international cooperation in 2025. As part of this, two new cooperation agreements were concluded (with the Czech and Moldovan counterpart agencies) in the areas of preventing and combating crimes, particularly corruption and corruption-related offenses, with the aim of enhancing information and experience exchange, sharing best practices, and establishing conditions for closer professional relations in terms of institutional capacity building.

<sup>3</sup> Article 287/C of Act XLII of 2015 *on the employment status of the professional staff of law enforcement agencies* (hereinafter: 'Hszt.') was amended by Article 81 of Act LXXVII of 2024 *on the amendment of laws related to the internal affairs sector*.

<sup>4</sup> Section 234(3) of Act XC of 2017 *on the Code of Criminal Procedure* was amended by Article 182 of Act XLIX of 2025 *on the Amendment of Laws Related to Judicial Matters*.

<sup>5</sup> Government Decree No. 293/2010 (of 22 December) was supplemented with a new subtitle titled '5/C. The contribution of NPS' by Article 3 of Government Decree No. 388/2025 (of 10 December) *on the Amendment of Government Decrees Concerning Criminal Law Matters*.

### The prosecutorial system

The prosecutorial system responsible for detecting, investigating, and preparing indictments for corruption crimes remained unchanged in 2025. The standardization of the organization of prosecutorial investigations and the integration of the Investigative Prosecution Office of the Capital into the system of the Central Chief Prosecution Office of Investigation and the subordinate regional investigative prosecution offices ensures the effective and timely execution of criminal proceedings in cases of corruption of public officials.

Cooperation with the European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO) has remained good. Based on the judicial recommendations sent by OLAF to the Office of the Prosecutor General, the domestic prosecution service – although not legally obliged to do so – initiates investigations in all cases on the basis of the decision by the Prosecutor General, or, if an investigation is already ongoing, attaches OLAF's recommendation to the investigation files and assesses it therein. Judicial cooperation with the EPPO, within the framework of the working arrangement concluded with the EPPO, is effective and generally smooth, and personal consultations with representatives and delegated prosecutors of the EPPO to promote cooperation are collegial and productive. Overall, it can be stated that cooperation with the EPPO in the course of the execution of requests for judicial cooperation and of European Investigation Orders issued by the EPPO is effective and flawless.

### Integrity Authority

The findings of the reports of the Integrity Authority are examined by the Managing Authorities. The proposed measures are considered cause for suspicion and the irregularity procedures are launched. The recommendations are assessed, and the Integrity Authority is informed on their fulfilment.

Similarly to the audit authority, the Integrity Authority has the highest-level access to the EUPR database (the database for the implementation of EU funds).

As regards the cooperation between the Integrity Authority and other Hungarian state bodies responsible for the fight against corruption, since its inception the Integrity Authority has adopted a cooperation agreement with the following state authorities:

- the Internal Audit and Integrity Directorate (*Q3 2023*),
- the National Tax and Customs Administration (*Q1 2024*),
- the Hungarian Competition Authority (*Q1 2024*),
- the Hungarian State Treasury (*Q1 2024*),
- the National Authority for Data Protection and Freedom of Information (*Q1 2024*),
- the State Audit Office of Hungary (*Q2 2024*),
- the National Office for the Judiciary (*Q3 2024*),
- the Directorate General for Public Procurement and Supply (*Q4 2024*),
- the Directorate General for Audit of European Funds (*Q3 2025*).

Since its inception the Integrity Authority has adopted a cooperation agreement with the following Universities and other bodies:

- the National University of Public Service (*Q3 2023*),
- the MBH Bank (*finalized by the Authority, not yet signed*).

Regarding the access to relevant databases by the Integrity Authority the provisions of Act XXVII of 2022 *on the control of the use of European Union budget funds* (hereinafter: Act

XXVII of 2022) and Government Decree No. 322/2024 (of 6 November 2024) *on detailed technical requirements for digital services, digital citizenship services and support services*<sup>6</sup> (hereinafter referred to as the 'Government Decree' under this point) ensure access to the Authority either directly to specified registries, or upon its request sent to the competent authorities. The Government Decree contains certain implementing rules for Act CIII of 2023 *on the Digital State and Certain Rules for the Provision of Digital Services*<sup>7</sup>) (hereinafter: Digital Citizenship Act) which stipulates that if the cooperating body under the Digital Citizenship Act is aware that information necessary for the pending case or the task performed but not available to it (in the case of personal or classified data, data that it may handle under the law) is available from a primary source of information, it shall obtain it electronically pursuant to Section 76 of the said act. Pursuant to Section 76(2), the information shall be obtained via an information transmission service ensuring automatic transmission, provided that the information is available and the law does not preclude this.

Pursuant to the Government Decree, the Authority has the right to directly and unlimitedly access to 44 registries (which includes the above referred private entrepreneur register and 43 other registers) through the so-called Central Governmental Service Bus (hereinafter: CGSB). The list of registers subject to automatic transmission of information via the CGSB can be found in Annex II to the Government Decree No. 322/2024.

In line with the relevant provisions set out in Act XXVII of 2022, concerning the establishment of the register of economic operators excluded from public procurement procedure, which is the only register that shall be set up and maintained by the Integrity Authority itself, the Authority is already provided direct and unlimited access to all four registries determined in Act XXVII of 2022 (the criminal records system, the company information system, the private entrepreneur register and the beneficial owner register). On the request of the Integrity Authority, the Government has started examining whether the conditions for issuing the Government Decree and the ministerial decree required under Section 69 (4)-(5) of Act XXVII of 2022 are met. Based on the replies of the responsible ministries, the specified conditions are met and all the necessary data for the establishment of the register of economic operators excluded from public procurement procedure will be available upon the Integrity Authority's submission of one final service access authorisation request. The Government requested the Integrity Authority to continuously provide information on the submission of the final request.

In case the Integrity Authority needs further information beyond the data available in the above referred registries, pursuant to Act XXVII of 2022, the Authority is provided access to all available information relevant to its tasks in its investigation procedures. With a view to carrying out its tasks, the Integrity Authority may request any person or organisation concerned in a particular case to provide information relating to its functions and powers. The requested organisations or persons shall comply with the data request of the Integrity Authority within the time limit of not more than 60 days set by the Authority. In case the requested organisation does not reply in the deadline set, the Authority may bring before the court actions for failure to act.

In accordance with Sections 11 and 12(2) of Act XXVII of 2022, the Authority published on 30 June 2025 its Annual Analytical Integrity Report covering the 2024 calendar year (hereinafter: 2024 Integrity Report) on its website, regarding which the Government's reply

<sup>6</sup> The text of Government Decree No. 322/2024 is available at the following link: <https://njt.hu/jogszabaly/2024-322-20-22>.

<sup>7</sup> The text of Act CIII of 2023 is available at the following link: <https://njt.hu/jogszabaly/2023-103-00-00>.

was sent to the Authority on 29 September 2025.<sup>8</sup>

The updated information on the progress related to the implementation of the recommendations formulated in the 2024 and previous Annual Integrity Reports is regularly sent to the European Commission as attachments to the quarterly progress reports within the conditionality procedure.

### Anti-Corruption Task Force

The Anti-Corruption Task Force (hereinafter: ACTF), continued its work in line with its tasks and responsibilities pursuant to Act XXVII of 2022. The ACTF regularly held its meetings (8 meetings in 2025). The minutes of the meetings are available at the website of the ACTF<sup>9</sup>.

As regards its composition, the following development took place in 2025. Following the resignation of a member of the ACTF representing non-governmental actors, the ACTF launched open calls for applications, but ended unsuccessfully on 31 March 2025, and once again, on 15 June 2025. A new call has been launched with the deadline of 30 September 2025. Another ACTF member representing non-governmental actors resigned on 5 November 2025, which reduced the number of non-governmental members of the ACTF to eight (out of ten). Upon the decision of the Directorate of the Integrity Authority of 26 November 2025, both applications were successful. Thus, the ACTF operates again with a full headcount.

Concerning its functioning, the followings worth mentioning. The President of the ACTF continued its evaluation process regarding the future activities of the ACTF, including how to avoid not to adopt its annual report again. In June 2025, the members were requested to fill out a questionnaire, based on which the ACTF Secretariat drafted a report summarizing the results. The report lays out recommendations formulated upon the responses of the members. The report and the questionnaire was discussed at the ACTF's meeting held on 18 September 2025. The ACTF made the following decisions at that meeting:

- Reforming the rules of procedures: The ACTF unanimously decided to reform its rules of procedure to ensure transparent decision-making. This includes formalizing consensus-seeking mechanisms, introducing virtual meetings, and creating an annual work plan with clear goals and deadlines.
- Structural changes: To improve efficiency, permanent sub-groups will be replaced by ad hoc expert committees with specific, time-limited mandates. The Secretariat's role will be enhanced to provide more professional support in drafting documents and coordinating the work of these committees.
- Reporting and thematic focus: The ACTF will produce shorter, focused thematic reports with the support of the Secretariat on specific topics, which will form part of the annual report.

In this respect, the ACTF adopted three key documents that shape its work: a new rule of procedure, a work plan covering the period until the publication of the next annual report (to be adopted by 15 March 2026), and a decision on the structure and main themes of the first thematic report.

<sup>8</sup> The Government's reply is publically available along with the previous Government responses to the Integrity Authority's previous Annual Integrity Reports via <https://www.palyazat.gov.hu/informacio/atlatathatosag> under the 'Egyéb – Egyéb átláthatósággal kapcsolatos dokumentumok' category. Also see the Government's reply to the 2024 Analytical Integrity Report under the following link: <https://integritashatosag.hu/jelentesek/>.

<sup>9</sup> See at the following link: <https://kemcs.hu/jegyzokonyvek/>.

The main new features of the rules of procedure include that the ACTF

- considers international anti-corruption standards and best practices, especially those set by the EU, OECD, Council of Europe, and UN, when carrying out its functions.
- prepares specialized thematic reports, assigns ad hoc expert committees as needed, and conducts analyses, makes recommendations, and shares examples of best practices. The drafting process emphasizes transparency, consultative drafting, and collaborative data collection through questionnaires and expert interviews.
- includes a summary of its activities for the year, the thematic reports and recommendations adopted on specific issues, and an update on the implementation of previous recommendations to its annual report.
- handles debate and disagreement through formal consensus-seeking and mediation procedures. If consensus cannot be reached, options include targeted consultations by a thematic committee, mediated negotiations by selected members, and separate decisions on non-contentious points while deferring disputed issues for further discussion. These structured approaches aim to ensure fair, transparent, and progressive resolution of debates within the ACTF.

Upon the ACTF's decision, the first thematic report will focus on education and awareness-raising to prevent corruption.

#### Directorate of Internal Audit and Integrity

The Integrity Authority is also the supervisory body of the Directorate of Internal Audit and Integrity (hereinafter: DIAI). The Integrity Authority has conducted audits on several topics regarding the activities of the DIAI and closed them without identifying any systematic deficiency. The DIAI has to submit its yearly activity report to the Integrity Authority before 31 March.

The cooperation between the DIAI and Integrity Authority, also supported by a Cooperation Agreement, is constructive both regards the audits and data requests.

#### Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.

As it was reported earlier, in February 2024, the Hungarian Government adopted by Government Decision No. 1025/2024 (of 14 February) the medium-term National Anti-Corruption Strategy for the period 2024-2025 (hereinafter: Strategy), and the Action Plan for its implementation (hereinafter: Action Plan). By doing so, the Government has undertaken an ambitious commitment to implement a total of 81 sub-measures (specific tasks) within the shortest implementation timeframe to date, covering numerous international recommendations.

In April 2024, a Monitoring Committee was set up to oversee the implementation of the Strategy and the Action Plan, with the Secretariat functions performed by the Corruption Prevention Department of the NPS. The tracking of progress in implementation is facilitated by the Monitoring Support Matrix (hereinafter: Matrix), detailing – on the basis of the Action Plan – the tasks to be implemented (the aforementioned 81 sub-measures), together with defined deadlines, responsible actors, and target indicators assigned to each task. The bodies responsible for reporting on individual tasks submitted information on implementation progress by the end of each quarter. Subsequently, the Monitoring Committee assessed the reports at its meeting held within one month following the respective quarter and thereafter

published the updated Matrix on a quarterly basis on the website [www.korruptciomegelozes.kormany.hu](http://www.korruptciomegelozes.kormany.hu), presenting information on the progress of individual sub-measures as well as the corresponding indicator values.

The entities concerned most recently reported on implementation progress at the meeting following the third quarter of 2025; consequently, the latest published version of the Matrix<sup>10</sup> does not contain information on implementation developments occurring after 30 September 2025.

The Action Plan contains 47 tasks that were required to be implemented either by the deadline of 30 September 2025 or on a regular basis. Based on the assessment of the bodies responsible for implementation, and according to the information provided in the Matrix for the third quarter of 2025, 32 of these 47 tasks have been completed, while 14 tasks are ongoing or partially implemented, and one additional task is dependent on the implementation of another measure that is still in progress.

In the Action Plan, there are 34 tasks scheduled with deadlines beyond 30 September 2025 (by 30 November 2025 or later). On the basis of the assessment provided by the bodies responsible for implementation, 16 of these tasks have been fully completed, while an additional 3 tasks have been partially carried out. Besides these, the implementation of 13 further tasks is currently ongoing. Moreover, 2 measures [point 7.5.b); point 9.b)] are contingent upon the completion of ongoing activities.

It is important to emphasize that the implementation rates of the measures illustrated above reflect data as of the 2025 third quarter Matrix; a more accurate assessment of the fulfilment of the assigned tasks will only be possible after the Monitoring Committee meeting expected to be held at the end of January 2026.

Nonetheless, according to the status as of the third quarter of 2025, it is evident that the results achieved, despite the short implementation period, through the cooperation and coordinated efforts of the competent government actors, other public authorities, and involved stakeholders, demonstrate a strong commitment to the suppression of all forms of corruption.

In order to account for the measures implemented and the achievement of strategic objectives within the timeframe of the Strategy that concluded on 30 November 2025, an independent and professional external evaluation of the effectiveness of the implementation has been initiated pursuant to point 9 of the Action Plan. *Századvég Konjunktúrakutató Zrt.* was commissioned to conduct an independent, professional external evaluation of the implementation of the Strategy. It is required to complete the evaluation by 28 February 2026, based on which the Minister of the Interior will submit a report to the Government. The final evaluation document is expected to be published in early February 2026.

Given that the Strategy is currently being implemented, a decision on a possible new National Anti-Corruption Strategy is expected after the implementation has been completed and evaluated.

The national anti-corruption strategic framework also includes the strategy against fraud and corruption involving funds from the European Union adopted in 2022, which was revised by the Government by Government Decree No. 1249/2024 (of 15 August). To ensure consistency between the strategy adopted for the protection of EU funds and the

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<sup>10</sup> The latest version of the Matrix referred to above is accessible at:

[https://korruptciomegelozes.kormany.hu/download/f/69/73000/Monitoring%20T%C3%A1mogat%C3%B3%20M%C3%A1trix%202025\\_III\\_negyed%C3%A9v.pdf](https://korruptciomegelozes.kormany.hu/download/f/69/73000/Monitoring%20T%C3%A1mogat%C3%B3%20M%C3%A1trix%202025_III_negyed%C3%A9v.pdf)

implementation of the measures of the Strategy, the Minister of Public Administration and Regional Development has prepared 2 evaluation reports, as prescribed in point 8 of the Action Plan.

#### Corruption Risk Analysis in Government Offices

As part of the below referred medium-term National Anti-Corruption Strategy for 2024-2025 and its Action Plan, a comprehensive risk analysis was carried out in government offices (in Hungarian: kormányhivatalok) to identify corruption exposure. That Action Plan sets a clear task for ministers to carry out a risk assessment covering the entire workforce, with the first phase to be completed by 30 November 2024, and the deadline for full implementation set at 30 November 2025.

The reports of the government offices clearly state that the purpose of the risk assessment is to identify the corruption exposure of various positions, mitigate the risks arising from personal administration, and strengthen organizational integrity. Government agencies in their reports point out that, in the performance of official and internal administrative tasks defined by law, the assessment of corruption risks is not only a legal obligation but also a fundamental condition for the functioning of the service-providing state. The reports emphasize in several places that in the case of tasks involving significant data processing and personal customer contact, exposure is increased, therefore analysis at the management level, the application of methodological guidelines, and the regular updating of internal regulations are essential. Risk analysis questionnaires were completed in all government offices, in many cases based on detailed task assignments recorded in the Government Personnel Decision Support System (Kormányzati Személyügyi Döntéstámogató Rendszer - KSZDR) system.

Based on the reports of the county government offices, the corruption risk questionnaire was completed and uploaded to the Government Personnel Decision Support System according to a uniform, nationally defined methodology, while taking local characteristics into account. In all cases, the offices carried out the assessment for all filled and vacant positions, with the basic data for the positions being recorded in advance by the human resources department in several places, and the risk content being filled in by the managers.

Based on the reports of the county government offices, the results of the corruption risk analysis show a nationally coordinated pattern that also reflects organizational characteristics. In most offices, the most common types of corruption risk were participation in administrative and regulatory proceedings, direct contact with Hungarian or dual citizens, and contact with managers of business associations. Working at a location other than the registered office or at an external site, and in many cases the handling of classified or confidential information, were also identified as common risk factors. Based on the methodological assessments, the occurrence of risk types is typically low or medium, and several offices emphasized that the overall risk exposure does not exceed a manageable level.

Overall, however, the investigation showed that the risk profile of county government offices is well defined, with most risks related to regulatory, customer relations, and data management activities, and that organizational controls are functioning properly.

#### Measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

The NPS continues to find that crime prevention lectures delivered to the protected staff

continue to prove an effective preventive tool. In 2025, a total of 502 such presentations were held, attended by 15412 members of the protected personnel. NPS representatives use these opportunities to draw the attention of the members of the protected staff of the abuses and illegal behaviour they should refrain from. These presentations contribute significantly to reducing corruption risks and strengthening the integrity of the protected personnel.

Officers serving in law enforcement agencies receive regular training on ways to address corruption effectively, covering legal requirements, ethical standards, and proper decision-making. Through its crime prevention presentations, the NPS raises participants' awareness of the typical risk factors identified in relation to their area of expertise. These trainings often also include guidance on handling corruption-related situations, methods to avoid conflicts of interest, and best practices for responding appropriately to attempts of corruption.

Regarding training activities on corruption prevention, the NPS's objective is to ensure that every final-year police non-commissioned officer student and police cadet enrolled in full-time law enforcement education receives training before they commence their actual service. As part of this, newcomers are shown examples of conduct to follow and patterns of behaviour to avoid, which help them recognize their individual responsibility and protect their integrity and honour during the performance of their duties.

The training also supports the ability to make proper decisions in situations involving corruption and the possibilities for its mitigation. In 2025, these small-group sessions were conducted with a total participation of 652 individuals, representing a 32% increase compared to the data from 2024. Additionally, in 2025, a newly developed training program was accredited within the Ministry of Interior's advanced training system.

Point 6.9 of the Strategy's Action Plan required the delivery of training programs aimed at increasing the resilience of professionals working in social care against fraud and corruption. These trainings have been continuously conducted since 15 February 2024. To date, NPS officials have delivered 30 presentations on integrity and corruption prevention to a total of 1627 professionals working in the social sector, including employees of the General Directorate of Social Affairs and Child Protection, and, following the extension of its authority, various child protection institutions.

The NPS delivered 39 presentations related to public education, with a total attendance of 1321 participants. Besides introducing the NPS and informing about its core tasks, the presentations also covered corruption prevention topics applicable to the social and public education fields. Participants included representatives from central administration, sectoral professionals, leaders, and institution maintainers alike.

The NPS continued to hold the sensitizing professional development day titled "Integrity Awareness School Program for Primary and Secondary Schools" by conducting four preparatory courses for teachers. The dissemination of this program lays the foundation for further fostering a value-driven attitude among the younger generation, supporting teachers in promoting value-based behaviour.

Last year, the 'How to say no?' campaign continued (as part of which a total of 3765 copies of this publication were distributed), alongside the distribution of the corruption prevention leaflet aimed at healthcare professionals and patients titled 'Gratitude is not money!', which was disseminated in 26740 copies.

By drawing attention to current and emerging modus operandi and the possibilities for their prevention, as well as by providing information on criminal intelligence results, awareness raising and prevention also receive prominent focus in the NPS's media communications.

In 2025, the state administrative bodies specified in Government Decree No. 50/2013 (of 25 February) *on the integrity management system of public administration bodies and on the procedures for receiving interest representatives* also assessed the integrity and corruption risks related to their operations within the integrated risk management system framework, and based on this assessment, developed an annual action plan to manage these risks accordingly. The overall results of the implementation of the action plan, along with the lessons learned and findings derived from it, were presented at a workshop organized for the integrity advisors of the relevant organizations. To support and coordinate the activities of the integrity advisors, the NPS distributes electronic newsletters containing a wide range of professional news and information beneficial to them in their daily work.

It was already indicated in the input provided for the 2025 Rule of Law Report that the Office of the Hungarian National Assembly adopted the Code of Ethics and Conduct in October 2024, which included provisions on handling conflicts of interest, the “revolving door” phenomenon, and rules of conduct related to lobbying activities. The code is accessible to employees via the Office’s internal electronic platform. Additionally, the integrity awareness training program and the corresponding assessment questionnaire for civil servants of the Office of the National Assembly have been developed. The IT developments required for the training have been completed, the materials as well as other resources are made available to civil servants.

As regards the Members of Parliament, given that Act XXXVI of 2012 *on the National Assembly* (hereinafter: Act on the National Assembly) and the Resolution of the National Assembly No. 10/2014 (of 24 February) *on certain rules of procedure* regulate the ethical rules applicable to Members of the Parliament at a normative level (see rules on gifts and conflicts of interest, which may even apply to the period after the termination of the mandate – Articles 80-89 of the Act on the National Assembly), no dedicated code of ethics has been drafted. In addition to the Act on the National Assembly, other laws also stipulate conflict of interest rules that exclude persons who have been Members of Parliament in the recent past from holding certain positions. Such positions include, for example, the following: a person who has been a Member of Parliament in the four years prior to the date of their election proposal may not hold the position of the Commissioner for Fundamental Rights or their deputy; the President or Vice President of the Integrity Authority may not be a person who has been a Member of Parliament in the five years prior to their nomination; likewise, the President of the National Authority for Data Protection and Freedom of Information may not be a person who has been a Member of Parliament in the four years prior to the proposal for their appointment.

Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party financing)

i) In the context of further strengthening freedom of information, amendment to the Information Act, introduced by Act LXXXV of 2024 should be mentioned, which entered into force on 1 January 2025. The amendment extended the scope of entities obliged to publish on the Central Information Register Platform to ‘legal persons registered in the general ledger under the Act on public finances other than national security services’, instead ‘of budgetary organs under the Act on public finances other than national security services’. Thus, the amendment expanded the range of bodies obliged to publish information on electronic platforms, thereby facilitating broader, more uniform and more easily accessible public availability of data of public interest and data public on grounds of public interest.

ii) The Strategy's Action Plan (points 1.3. and 1.5.) set forth the assessment of the application of political party financing rules and the operational practices of political organizations, to ensure their conformity with international and EU legal standards. The aim of this review process is to prepare legislative or non-legislative proposals that contribute to strengthening the transparency and resilience of the democratic institutional system, with regard to the consequences stemming from Act LXVIII of 2025 *amending Act LXXXVII of 2013 on the transparency of campaign expenditures for members of the National Assembly*, as well as from the entry into force of Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 *on the transparency and targeting of political advertising*.

iii) Due to the limitations of its mandate, the State Audit Office of Hungary (hereinafter: SAO) does not take measures in this field. Through its audit activities, findings based on its audit experience, suggestions and recommendations, it assists the Parliament and its committees and the work and transparency of the organisations it audits and can audit (including political parties). In accordance with the provisions of the Act on the State Audit Office of Hungary<sup>11</sup>, the SAO audits the financial management of political parties and the use of contributions disbursed by the Parliament to the parliamentary groups of political parties from a legal perspective, thereby promoting the transparency of political party financing.

Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned)

i) In accordance with the rules applicable to professional personnel, law enforcement employees are obligated to provide a written statement each year declaring whether they are involved in any activities conflicting with their professional responsibilities. In the case of the NPS, no instances of conflicts of interest were detected as a result of the 2025 review.

ii) The Strategy's Action Plan (point 4.8.) tasked the Minister of Public Administration and Regional Development with preparing a methodological guide for municipal employees on – among other things – the practical aspects of preventing conflict of interest situations with a view to identify and promote best practices. The methodological guide has been finalized and made publicly available.<sup>12</sup>

iii) In 2025, no procedure was conducted within the Parliament for the declaration of assets, and therefore no sanctions were imposed. In 14 cases MPs voluntarily corrected the contents of their declarations of assets by clarifying the positions they held. There were no incompatibility and conflict of interest proceedings in 2025.

Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given)

As it was reported earlier, in Hungary, Act XXV of 2023 *on complaints, disclosures of public interest and rules related to reporting abuses* (hereinafter: Act XXV of 2023), together with the Government Decree No. 225/2023 (of 8 June) *on the designation of government bodies* required to establish a separate abuse reporting system designated a total of 22 bodies whose

<sup>11</sup> Act LXVI of 2011 on the State Audit Office (see at: <https://njt.hu/jogszabaly/2011-66-00-00.30>).

<sup>12</sup> See at the following link:

<https://cdn.kormany.hu/uploads/sheets/0/0c/0cb/0cb76739e09cb3b322c5123df731cf0.pdf>.

scope and remits cover the abuse reporting subjects specified in Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 *on the protection of persons who report breaches of Union law*. The protection of individuals disclosing information of public interest (whistleblowers) is ensured by Act XXV of 2023 (Articles 13 to 15).

The regulatory framework of these systems, as well as those reporting mechanisms operating in Hungary already presented as part of contributions to earlier rule of law reports<sup>13</sup> guarantees that information on suspected corruption can be easily submitted by anyone and that all reports shall be strictly examined.

Under the Strategy's Action Plan [point 6.7. a)], an information campaign was to be prepared on the functions of parallel whistleblowing systems, the reporting process and its benefits, the protection of the whistleblower, and citizens' responsibility for reporting abuses threatening the public interest. In order to ensure that the information necessary for achieving the objectives defined in that task reaches the entire Hungarian business sector – including small and medium-sized enterprises – within the framework of the information campaign, the authorities responsible for implementation concluded a cooperation agreement with the Hungarian Chamber of Commerce and Industry. The information material has been completed, distributed to 23 territorial chambers, and is also available on the website of the Hungarian Chamber of Commerce and Industry.<sup>14</sup>

The Hungarian framework for whistleblower protection, spearheaded by the OCFR, represents a robust and matured system that has been effectively operational since 1 January 2014. Central to this framework is a secure, anonymous electronic reporting system that allows individuals to disclose unlawful conduct without fear of retaliation, a mechanism that has proven essential given that a significant proportion of whistleblowers consistently choose to report anonymously. To ensure these measures are accessible and understood, the Office maintains a comprehensive, user-friendly digital guide and a network of six regional customer service centers that provide personal and telephone assistance to citizens. These outreach efforts are further supported by the publication of anonymized summaries of disclosures and their outcomes, as well as a phased training campaign for public administration staff. This training, developed in cooperation with the Ministry of Justice and the National University of Public Service, is currently being integrated into the *Probono* digital platform to ensure that civil servants are expertly equipped to handle reports under the 2023 legislative reforms.

The CFR continues to provide ongoing supportive cooperation to enhance awareness among the general public and the acting authorities. Since the date of entry into force of Act XXV of 2023, the OCFR has provided detailed information on its website<sup>15</sup> regarding the protected electronic system for public interest disclosures and whistleblowing reports, the reporting procedure, and the protection of the whistleblower's identity. This includes information on the scope of state support available to whistleblowers as defined by legislation. Furthermore, an information booklet outlining the operations of the OCFR was published on its website in a downloadable electronic format. In addition to its Budapest headquarters, the OCFR operates customer service centers in six major regional cities, providing information to

<sup>13</sup> Such as the Telephone Witness Programme, the NPS's toll-free hotline and its other secure reporting channels, the anonymous conflict of interest reporting platform operated by the Directorate of Internal Audit and Integrity, etc.

<sup>14</sup> See at the following link: <https://mkik.hu/hirek/mkik-tajekoztatas-a-visszaeles-bejelentesi-rendszer-mukodtetesrol>.

<sup>15</sup> See at: [www.ajbh.hu](http://www.ajbh.hu).

interested parties via telephone and in person. Upon written request for information, the OCFR provides non-binding guidance. Anonymized extracts of the reports and their outcomes are automatically published on the OCFR's website to ensure transparency and accountability. The status of submitted public interest disclosures and whistleblowing reports can be tracked through the online platform.

Regarding the application of these measures and the resulting data, the OCFR has fully complied with its statutory obligations under Act XXV of 2023 by submitting its first comprehensive data report for the 2024 by the deadline of 31 March 2025. This report, submitted in the standard format prescribed by the European Commission, provides the factual basis for the system's reach and effectiveness in detecting corruption-related offenses. Furthermore, Hungarian law extends protections beyond the minimum requirements of Directive (EU) 2019/1937, offering specific legal safeguards for media informants under the Criminal Procedure Act and the Media Act. The OCFR has met all implementation and reporting milestones in a timely manner, and the resulting data is undergoing international review.

#### Office of the Parliament

The provisions of Act XXV of 2023 were incorporated into internal regulations by Director General Regulation No. 15/2023 *on the internal control system* within the Office of the Parliament.

Reports are based on the presumption of a violation of EU law, while ethical and behavioral complaints within the Office of the Parliament are based on violations of the provisions of the Director General's Regulation on the Code of Ethics and Conduct of the Office of the Parliament. The Code does not contain any provisions concerning Members of Parliament, as ethical rules (e.g. rules on gifts, or conflicts of interest, which also apply to the period after the end of their term of office) are regulated at a normative level by the Act on the National Assembly and the Rules of Procedure.

In 2025, training and non-compulsory examinations were held in this area on the Office's training and examination platform, which were completed by a high proportion of the Office's staff.

In 2025, a report of integrity violation was received, which led to disciplinary proceedings.

Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups

The authorities belonging to the protected staff of the NPS represent the "visible faces" of rule-of-law governance, playing a role in the fight against corruption not only through the fulfilment of their enforcement duties but also by conveying normative standards and serving as role models. Due to their special position, they are required to act against corruption while at the same time being exposed to the risks of corruption themselves. This duality renders their work particularly sensitive, as even the suspicion or mere perception of corruption can seriously undermine public trust in these institutions.

The NPS's criminal intelligence data indicate that within law enforcement, the border policing service branch is particularly exposed to corruption risks. Although the personnel of border policing offices in the Eastern part of the country is exposed to increased risk of

corruption, it can be affirmed that the extent of corruption has significantly decreased compared to several years ago and even relative to the 2024 situation. The NPS still considers the border sections with Serbia and Ukraine, as well as the border policing offices there as priority areas, where abuse of office, bribery committed by public officials in violation of their official duties, and smuggling remain the most characteristic categories of offenses underlying the initiated procedures.

As part of its efforts to detect criminal offences committed in an official capacity and corruption-related offences, the NPS places increased focus on groups of offenders showing signs of organised crime and drug abuse; however, it has not identified any areas as being particularly vulnerable to corruption involving organised criminal groups. Organized criminal groups are generally known to seek to gain positions and avenues of influence across all sectors of public administration. The experiences of the NPS nevertheless show that members of its protected personnel only have low level connections with classic organized criminal groups. The identification of opportunities for organized criminal groups to infiltrate public administration, and the prevention of their attempts to influence the staff of protected organisations, are considered priority goals by the NPS at all times.

The NPS detects and prevents identified risks by employing methods of secret information gathering on the basis of the Act on the Police, along with broad application of means that are subject to permission of a judge.

Compared to 2024, the NPS's covert information-gathering operations have resulted in a significant increase in both the number of cases concluded with a formal criminal complaint and the number of individuals reported.

Regarding both the Police and the prison services, the „cleansing process” which began among their personnel in recent years has continued, owing significantly to the NPS's protective, preventive, and detection efforts.

The level of corruption and the willingness to its commitment has decreased among public order police personnel. The previously observed phenomenon of so-called “pocket fines” in connection with police actions related to traffic violations is nowadays seldom encountered.

During the past period, as regards the activities of government offices, the NPS has observed increased corruption pressure in areas such as vehicle roadworthiness testing, official veterinary activities, building authority activities, administrative data handling and monitoring, as well as oversight of hospitality sector units.

In the healthcare sector – particularly concerning patient care – corruption pressure remains prevalent. The offenses most frequently reported remain bribery and the acceptance of bribes, consistent with previous years. In the field of public education, corruption activities related to public procurement involving senior government officials at district education center management levels have been uncovered in cases resulting in reports, investigation initiations.

Within child protection, public procurements, grant applications, and investments were examined through performing integrity test, during which the individuals involved consistently refused corruption attempts in all instances and behaved in accordance with the legal requirements.

The outcomes of procedures concluded by the NPS in 2025 confirm the high level of resilience of the protected bodies' members to the risks of corruption.

### *The activity of the SAO*

The aim of the SAO is to increase the effectiveness of its audit activities by conducting detailed reviews of audit areas and sectors of the national economy and mapping their risks. In line with this, the organisation's new Organisational and Operational Rules<sup>16</sup>, effective from March 2025, have restructured its tasks and powers. In addition to their general responsibilities, the audit directorates now also have responsibilities based on their professional and sectoral areas of competence. Due to the organisational restructuring and professional specification, staff can become audit experts in areas considered by the European Commission to be at high risk of corruption, such as public procurement, defence, concessions, agricultural management, construction investments, healthcare, budgetary support, etc.

Audits are supported by methodological guidelines and manuals<sup>17</sup>, including in the area of public procurement audits<sup>18</sup>.

In line with this, the SAO's Strategy<sup>19</sup>, also effective from March 2025, it places particular emphasis on the implementation of a supervisory approach, including the monitoring of public procurement and subsidies paid outside the public sector. With its supervisory approach and risk-based selection of audit topics, the SAO contributes to transparency in the management of public funds and national assets. To this end, it continuously monitors and analyses the economic events and financial processes of the organisations it audits, assesses the risks identified and carries out audits aimed at uncovering these risks and formulating recommendations for improvement.

To support all these tasks, the SAO has developed and operates a risk analysis framework<sup>20</sup>, which it has made available on its website, together with a risk matrix<sup>21</sup> that can be searched by organisational area.

Under the law, the SAO develops its own professional rules and methods for conducting audits and publishes<sup>22</sup> the rules it has developed. Based on its auditing principles and methodology<sup>23</sup>, which have been in force since October 2024 and have been developed in accordance with INTOSAI international standards, the SAO carries out combined, system and legality audits, as well as advisory audits within the framework of its advisory activities. The SAO may carry out combined audits using any combination of the legality, expediency and effectiveness criteria set out in the Fundamental Law, depending on which criteria it considers relevant to the audit topic and the purpose and subject of the audit. Audits that were previously typically conducted on the basis of regularity criteria may thus be expanded to include criteria of expediency and effectiveness, which allow for more complex findings to be made in relation to a given audited area.

In 2025, the SAO identified numerous cases of violations of public procurement rules, related breaches of transparency, or inadequate functioning of controls. Based on the

<sup>16</sup> See at the following link: [https://www.asz.hu/files/1\\_2025\\_III\\_14\\_ASZ\\_SZMSZ.pdf](https://www.asz.hu/files/1_2025_III_14_ASZ_SZMSZ.pdf).

<sup>17</sup> These are available at the following link: <https://www.asz.hu/en/professional-rules-of-auditing>.

<sup>18</sup> It is available at the following link: [https://www.asz.hu/dokumentumok/kozbesz\\_modszertan.pdf](https://www.asz.hu/dokumentumok/kozbesz_modszertan.pdf).

<sup>19</sup> See at the following link: <https://www.asz.hu/en/strategy>.

<sup>20</sup> The document is available at the following link: [https://www.asz.hu/files/Kockazati\\_terkep\\_leiras.pdf](https://www.asz.hu/files/Kockazati_terkep_leiras.pdf).

<sup>21</sup> See at the following link: <https://www.asz.hu/kockazati-matrix-szervezeti-koronkent>.

<sup>22</sup> See at the following link: <https://www.asz.hu/en/saos-rules-of-auditing>.

<sup>23</sup> The document is available at the following link: [https://www.asz.hu/files/SAO\\_auditing-principles-and-methodology\\_FIN.pdf](https://www.asz.hu/files/SAO_auditing-principles-and-methodology_FIN.pdf).

findings of audits conducted among state-owned companies (see audit reports No. 24180<sup>24</sup>, 24208<sup>25</sup>, 24209<sup>26</sup>, 25001<sup>27</sup>, 25051<sup>28</sup>, 25052<sup>29</sup>, 25080<sup>30</sup>, 25100<sup>31</sup>) revealed typical errors and deficiencies in the conduct/omission of procedures, the compilation, modification and publication of public procurement plans, and other irregularities related to the publication of data of public interest.

In addition, the SAO made several negative findings in its audits of central budgetary agencies, local governments, sports associations and sports clubs due to shortcomings in public procurement (in the context of auditing the regularity of material and capital expenditure by budgetary agencies belonging to the central subsystem of public finances, in its reports No. 25019<sup>32</sup> and 25033<sup>33</sup>; in relation to the audit of certain IT procurements by central budgetary agencies in its reports No. 25061<sup>34</sup> and 25062<sup>35</sup>; in the case of the audit of the property management activities of local governments in its report No. 25067<sup>36</sup>; in the audit of the management of sports federations, sports associations and sports enterprises receiving subsidies in its report No. 25040<sup>37</sup>. Typical shortcomings in this area included the failure to conduct public procurement procedures, irregularities in related accounts, and the failure to publish contracts.

In many cases, the SAO's audits drew attention to violations of certain conflict of interest rules or disclosure obligations, which affected a wide range of audited entities. (See audit reports No. 25035<sup>38</sup>, 25036<sup>39</sup>, 25048<sup>40</sup>, 25006<sup>41</sup>, 25058<sup>42</sup>, 25059<sup>43</sup>, 25098<sup>44</sup>, 25101<sup>45</sup> on conflicts of interest, and 2501546 and 25037<sup>47</sup> on disclosure obligations). The SAO examined the fulfilment of disclosure obligations by local governments as part of a targeted audit, on which it published several reports in 2025 (Audit reports No. 24217-24221<sup>48</sup>).

On the initiative of the SAO, the Public Procurement Arbitration Board (hereinafter: PPAB) took action against 10 audited organisations in 2025 due to public procurement violations detected during the audit. These organisations included one national sports association, two

<sup>24</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/24180.pdf>.

<sup>25</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/24208.pdf>.

<sup>26</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/24209.pdf>.

<sup>27</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25001.pdf>.

<sup>28</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25051.pdf>.

<sup>29</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25052.pdf>.

<sup>30</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25080.pdf>.

<sup>31</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25100.pdf>.

<sup>32</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25019.pdf>.

<sup>33</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25033.pdf>.

<sup>34</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25061.pdf>.

<sup>35</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25062.pdf>.

<sup>36</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25067.pdf>.

<sup>37</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25040.pdf>.

<sup>38</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25035.pdf>.

<sup>39</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25036.pdf>.

<sup>40</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25048.pdf>.

<sup>41</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25006.pdf>.

<sup>42</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25058.pdf>.

<sup>43</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25059.pdf>.

<sup>44</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25098.pdf>.

<sup>45</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25101.pdf>.

<sup>46</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25015.pdf>.

<sup>47</sup> The document is available at the following link: <https://www.asz.hu/dokumentumok/25037.pdf>.

<sup>48</sup> See the respective documents at the following links: <https://www.asz.hu/dokumentumok/24217.pdf>; <https://www.asz.hu/dokumentumok/24218.pdf>; <https://www.asz.hu/dokumentumok/24219.pdf>; <https://www.asz.hu/dokumentumok/24220.pdf>; <https://www.asz.hu/dokumentumok/24221.pdf>.

business entities (companies), one museum, and six budgetary institutions operating as healthcare institutions. In connection with the procurements examined, 25 legal remedy proceedings were initiated before the PPAB. Following the consolidation of the cases, 16 decisions were made, of which 13 found that the PPAB determined that the public procurement procedure had been unlawfully disregarded (in one case, no violation was found, while in two cases the appeal proceedings were terminated). The PPAB imposed a total of HUF 189.8 million in fines on the contracting authorities for the infringement and as a legal consequence of the invalidity of the contract, with the lowest fine amounting to HUF 2 million and the highest fine amounting to HUF 44 million. On 31 December 2025, three proceedings were still pending.

Based on the audits conducted by the SAO, reports were filed in the case of four large group of audited organisations, as illustrated in the figure below. In 2025, the SAO made accusations in relation to 25 organisations. The accusations concerning the 25 organisations related to a total of 35 cases: 18 cases of budget fraud, 6 cases of misappropriation of assets, 4 cases of embezzlement, 2 cases of negligent management, 2 cases of accounting irregularities, 1 case of abuse of office, 1 case of money laundering and 1 case of fraud.

The accusations of the SAO covered irregular payments, accounting irregularities, overpricing, use of subsidies for purposes other than those approved, double-counting, unauthorized use of subsidies and asset management irregularities. The SAO's accusations concerned alleged damage/financial disadvantage of HUF 4.3 billion.

The SAO made its accusations with the National Tax and Customs Administration in 15 cases, the prosecution service in 6 cases, and the police in 4 cases. Numerous procedural actions were carried out in case of the authorities (referral, witness hearing, separation, information about the initiation of proceedings), but in case of none of the reports the SAO was informed that charges had been filed.

#### Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

In its crime detection activities, the NPS closely monitors areas most exposed to corruption pressure, such as procurement, official licensing, and official inspections. When becomes aware of information concerning any corruption offense, the NPS undertakes secret intelligence gathering or initiates preparatory proceedings. Additionally, integrity tests are also regularly conducted in these fields.

The NPS's findings indicate that in government offices, staff involved in data processing, authorization, and specialized expertise areas, as well as officials responsible for official inspections, are the most susceptible to corruption risks. The NPS also monitored the official licensing sector at disaster management agencies, which led to the filing of a report/initiation of an investigation concerning bribery committed in a business-like manner.

#### *The State Investment Act*

Act LXIX of 2023 *on the procedure for state construction investments* (hereinafter: State Investment Act) entered into force on 9 November 2023. The aim of the Act is to ensure that state construction projects are well prepared, cost-effective, transparent and implemented swiftly. As a general rule, the Act introduced the requirement that, in the case of state construction investments, a public procurement procedure for works may be launched only if detailed construction plans have been completed. This has reduced cost risks both for contracting authorities and for tenderers. Designers are required to prepare the construction

plans using BIM (Building Information Modelling). The use of the BIM model accompanies the construction investment throughout the entire process until handover for operation. The application of the BIM model significantly enhances the client's control capabilities. The State Investment Act requires the establishment of a project organisation. As a new feature, up to the handover for operation – and alongside other participants – the designer, the technical inspector and the cost controller must mandatorily participate in the projects. These three participants are responsible for ensuring the cost-effective delivery of the projects.

Contracts for construction investments implemented by the Ministry of Construction and Transport include so-called Open Book provisions. Among other things, these require the successful tenderer to keep separate accounts for the investment, to develop a project cost allocation policy applicable to the contractor and its subcontractors and to provide a project-based audit report for each partial performance. In calls for tenders published since the end of 2025, it is also stipulated that tenderers must, when submitting their bids, present in their priced bill of quantities, item by item, the contractor's material costs, fee/labour costs, indirect costs and planned profit; furthermore, continuous report to the contracting authority on any changes arising in this respect throughout implementation is a must.

The State Investment Act requires that if the submitted tenders exceed the available budgetary funds, the minister – acting with the involvement of the competent sectoral minister – shall decide whether to halt the investment or have it redesigned. Thus, broader competition and lower bid prices are ensured by complementing the rule of (Act CXLIII of 2015 *on public procurement* (hereinafter: Public Procurement Act) where a winning choice may not be announced in the case of construction investments, solely on the basis of a single tender.

### Energy

The Hungarian Energy and Public Utility Regulatory Authority Office (in Hungarian: Magyar Energetikai és Közmű-szabályozási Hivatal, hereinafter: MEKH) based on the authorization provided by Act XXII of 2013 *on the Hungarian Energy and Public Utility Regulatory Authority*, exercises its supervisory authority to monitor the activities of permit holders. If, during its oversight activities, the MEKH becomes aware of any fact or data indicating that a permit holder is not conducting its activities according to the terms laid out in the issued permit, it has the right to impose sanctions. If the discovered legal violation falls outside of its jurisdiction, the MEKH must immediately inform the relevant authority with jurisdiction.

Mining supervisory procedures, like other administrative procedures, are conducted in accordance with the Code of Administrative Procedure. The relevant provisions of the Code of Administrative Procedure (e.g. Section 33) ensure the transparency of the procedures. Furthermore, Act CXII of 2011 *on the right to informational self-determination and on the freedom of information* (hereinafter: Information Act) allows access to documents related to specific procedures. The mining authority has no discretion in procedures for granting, transferring, or terminating mining rights; applications that meet the legal requirements must be approved, in the order of receipt. Administration and document management are done electronically, the filing system automatically and indelibly logs every event, so any procedure can be checked afterwards.

With regard to the district heating licensing procedure in Hungary, the provision of district heating to household consumers is an activity that can be carried out based on an official license, regardless of size. The detailed rules of issuing licenses are set out in Act XVIII of

2005 *on district heating* (hereinafter: Act XVIII of 2005) and in the Government Decree No. 157/2005 (of 15 August) on the implementation of the Act. The transparency of the licensing procedure is ensured by detailed legal regulations and multi-actor control.

According to the legislation, the licenses are issued by the MEKH based on an application. The activities of licensees are controlled by the independent local government notary and the consumer protection authority in addition to the MEKH. The tasks of these bodies are set in the legislation. The procedural rules for the license issuing are determined by the Code of Administrative Procedure.

In the licenses, the MEKH's decision must be justified in detail according to the Code of Administrative Procedure. The decisions of authorising licensees shall be published on the website of MEKH. Furthermore, an administrative lawsuit may be initiated against the decision issuing or designating the license within 30 (thirty) days of the notification (receipt) of the decision. The client must also be informed in detail about the method of submitting the claim. This process ensures publicity and legal protection for the clients.

In district heating, district heat supplier and district heat producer licenses are issued. The legal condition for issuing district heat supplier licenses is an agreement approved by the representative body of the relevant municipality, which ensures the enforcement of local interests. District heat producers supplying district heat suppliers must sign a contract for the sale of district heat with a district heat supplier operating on the basis of local authorization, which ensures the enforcement of local interests. If the supply of consumers is inadequate, they can turn to the MEKH and the consumer protection authorities in addition to the local government, thus excluding significant harm of consumer interests through local mergers.

In the event of damage attributable to the licensee of continuous and safe supplies of the consumers, MEKH shall revoke the license *ex officio* in accordance with the provisions of the Act XVIII of 2005 and temporarily assign another licensee to the activity until a new license is being applied for. That provides the clarity of issuance of licensees as described above.

The presented district heat license issuing process in itself ensures that, in addition to the priority of security of supply, local candidates – in case of completing the requirements – shall receive the license and the possibility of operation in the district heating market.

#### Environment/circular economy

In 2025, a review was conducted of the practices followed by waste management authorities in the waste management licensing process. The review found that the various methods used by waste management authorities in the waste management licensing process comply with the legal requirements currently in force, however, it is necessary to standardize the procedures currently used in the official licensing of waste management activities, as this can promote more effective and consistent law enforcement and indirectly contribute to the prevention of violations related to waste management activities. In order to achieve this goal, further studies should be carried out to identify the most effective means of promoting uniform legal practice (amendments to legislation, issuance of professional guidelines, training).

#### The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

### Revamped framework for the liability of legal persons

According to the recommendations of the OECD Working Group on Bribery (OECD WGB), a comprehensive revision of Act CIV of 2001 *on the criminal measures applicable on the legal person* became necessary in order to provide for a more coherent and efficient legal framework as far as the criminal liability of legal persons is concerned.

The above-referred Act XLIX of 2025 was adopted, inter alia, with the aim complying with the OECD recommendations, as well as to introduce reforms in the framework of the liability of legal persons following the experience of legal practitioners, to boost efficiency, eliminate disproportionalities and loopholes. The amendment also aimed at implementing Directive (EU) 2024/1226 *on the definition of criminal offences and penalties for the violation of Union restrictive measures and amending Directive (EU) 2018/1673*. The provisions establishing the below summarized new framework came into force on 2 January 2026.

The main novelty of the revamped framework is the approach that puts legal persons into a similar legal situation to a defendant in the course of the criminal proceeding, and provides them with the possibility of adequate defence, and the possibility of adequate cooperation.

The new framework has the potential to induce a major paradigm-shift via strengthening the principle of officiality and introducing a system of procedural cooperation (i.e. plea-bargaining) in these procedures. With the realignment of the applicable measures, the new system also incentivises cooperation with the authorities.

The expected overall effect of the new system is an uptrend in terms of number of procedures against legal persons with a decline of the procedural length at the same time, as well as measures applied becoming more balanced and proportionate.

With a system more focused on proportionality, legal persons aiming for clean and lawful operations, with only and ad-hoc connection to a criminal offence should be allowed to continue their operation on the market, if they were willing to restore their lawful operation and to provide adequate assurances.

In addition, the new regime has a broader scope of criminal liability: even if the legal person comes into existence only after the commission of the offence but before the final judgement in the criminal case is rendered, this regime shall be applied. It is also applicable to the legal successor of the legal person concerned. Additionally, a person who acquires a leading role in the legal person only after the commission of the offence shall nevertheless be considered as a person having a leading role.

### New aggravated bribery-offence

In order to tackle corruption more efficiently and to maintain coherence within Act C of 2012 *on the Criminal Code* (hereinafter: CC), a paragraph (2a) was added by Act XLIX of 2025 to Section 293 establishing a more severe punishment (1 to 5 years or 2 to 8 years of imprisonment depending on the circumstances) for committing the offence of active bribery regarding a public officer either regularly for generating income, or in a criminal conspiracy. This mirrors Section 290(3) of the CC, which already provided for these aggravated offences in terms of the offence of active (private sector) bribery. The amendment thus provides the coherence between the offences of active bribery in the public and the private sector.

The above-referred new Section 293(2a) of the CC is as follows.

*“(2a) The punishment shall be imprisonment for*

*a) one to five years in the case specified in paragraph (1),  
b) two to eight years in the case specified in paragraph (2),  
if the criminal offence of active bribery is committed in a criminal conspiracy or regularly for generating income.”*

Together with the new provisions on the deadlines of investigation in the Code of Criminal Procedure (see below), this amendment also results in longer investigation-deadlines for more serious offences.

High-level corruption is predominantly committed in a criminal conspiracy or regularly for generating income; therefore, the amendment also provides more room for manoeuvre in these high profile cases.

#### *New rules on the time limits of investigations*

In September 2025, Section 351 of the Code of Criminal Procedure was amended and new provisions were introduced in terms of time limits for investigations in order to comply with the recommendation of the OECD WGB. The new system did not extend these time limits in general, but it introduced different time limits based on factors indicating the complexity of a case. Multi-level extensions are only possible in the most complex and time-consuming cases. Not only the new framework revamped the regime of time limit extensions but it also established a 3-tier basic time limit system based on statutory penalty levels instead of the former one single time limit.

The new provisions of Section 351 of the Code of Criminal Procedure are as follows:

*“(3) The time limit for an investigation shall be as follows:*

*a) in a criminal proceeding pending for a criminal offence punishable by imprisonment for not more than three years, one year, calculated from the interrogation of the suspect;*

*b) in a situation other than that specified in point a), two years, calculated from the interrogation of the suspect;*

*c) in a criminal proceeding pending for a criminal offence punishable by imprisonment for up to eight years or more, three years, calculated from the interrogation of the suspect.*

*(4) If section 91 (3) of the Criminal Code applies, the time limit for the investigation as specified in paragraph (3) shall be calculated on the basis of the increased penalty range provided for in section 91 (1) of the Criminal Code.*

*(5) The prosecutor may extend the time limit of the investigation as specified in paragraph (3) for an additional period of up to six months.*

*(6) The superior prosecutor may extend the time limit of the investigation, as extended in accordance with paragraph (5), for an additional period of up to one year, where the proceeding was protracted because*

*a) a procedural act involving the territory of a foreign state was carried out;*

*b) special expertise was required in relation to the information system used for the commission of the criminal offence;*

*c) more than 10 suspects or more than 50 aggrieved parties participate in the proceeding;*

*d) the proceeding is pending for a criminal offence committed in a criminal conspiracy or in a criminal organisation;*

*e) the suspect hid or escaped;*

*f) of the necessity of the enforcement of a motion submitted by the suspect following the inspection in full of the case documents of the investigation, and the suspect consents to it.*

*(7) In a proceeding pending for more than one criminal offence or against more than one suspect, paragraph (5) may be applied only if the separation of the proceeding is not*

*permissible in relation to a suspect or an act, or such a separation would endanger the successful conduct of the proceeding.*

*(8) Paragraph (6) shall not apply where the suspect is in pre-trial detention for a period of more than one year.”*

Official data on the number of investigations, prosecutions, final judgements, and the application of sanctions for corruption offences (differentiated by offence if possible)

i) Number of persons convicted (on a final level) for corruption related crimes:

- 2019: 328
- 2020: 260
- 2021: 326
- 2022: 307
- 2023: 373
- 2024: 283
- 2025: 298

The data previously published and reported for the years 2023 and 2024 have been revised in the meantime. The discrepancy (increase) compared to the previous data was due to the replacement of the missing data at that time. It is necessary to emphasize that the data for 2025 also come from a database that has not yet been closed, so changes may occur later.

ii) Statistics related to the use of the specific procedure in the case of special crimes related to the exercise of public authority or the management of public property

*Data provided by the Office of the Prosecutor General*

In connection with the dismissal of criminal complaints and the termination of proceedings, in the case of serious crimes related to the exercise of public authority or the management of public property, the specific proceedings to be conducted in accordance with Chapter CV/A of the Code of Criminal Procedure also confirm that the prosecution service performs its duties lawfully and effectively: since the introduction of this legal institution on 1 January 2023, the entitled persons have not filed a single supplementary private indictment. At the same time, the new legal institution was suitable for increasing trust in the prosecution service. Consequently, with regard to this category of criminal offences, there has been no example in which the court has established criminal liability in supplementary private prosecution proceedings concerning a person against whom the investigative authority or the public prosecution office had previously dismissed the complaint or terminated the proceedings.

Official statistical data for the entire year 2025 are not yet available, so data could only be reported for the period ending 30 June 2025. From 1 January 2023 to 30 June 2025, the prosecution service has received a total of 215 motions for judicial review. Motions for judicial review were lodged in 154 cases against decisions dismissing criminal complaints and in 61 cases against decisions terminating proceedings. Of these, the prosecution office forwarded 123 motions to the investigative judge and granted 58 motions on its own authority. Fifteen motions were not legally valid and were therefore not forwarded.

24 motions were submitted directly to the investigative judge by the investigative authority or other persons. The court rejected the motions in 128 cases, granted it in 15 cases, and at the time of reporting, 4 motions for judicial review were pending. Broken down by year, the Buda Central District Court received 35 motions in 2023, 80 in 2024, and 36 in the first half

of 2025 (see below the data covering the whole year of 2025). (These figures also include motions sent directly to the court by the investigative authority or the person concerned.) The court granted 5 (14.2%) motions in 2023. Concerning the number of motions in 2024, see below the data covering the whole year of 2024. As a result of the investigative judge's decision to grant the motion, the criminal proceedings continued in these cases, but no indictment was filed in any of them, which justifies the soundness of the decisions made by the investigative authorities and prosecutors regarding the conclusion of the proceedings.

The effectiveness of criminal proceedings regarding corruption offences is supported by the following statistical data:

| 2024                                     | Procedural actions                   |             | Procedural actions                  |             |
|------------------------------------------|--------------------------------------|-------------|-------------------------------------|-------------|
|                                          | Total number of criminal proceedings |             | Total number of corruption offences |             |
| <b>Total</b>                             | <b>428 449</b>                       | <b>100%</b> | <b>8 229</b>                        | <b>100%</b> |
| Crime report dismissed                   | 23 870                               | 5.6%        | 97                                  | 1.2%        |
| Termination of proceedings/investigation | 127 544                              | 29.8%       | 968                                 | 11.8%       |
| Indictment                               | 185 451                              | 43.3%       | 7 077                               | 86.0%       |
| Other                                    | 91 584                               | 21.4%       | 87                                  | 1.1%        |

According to statistical data, indicators for investigations into corruption crimes are better than average in all areas: the rate of dismissed complaints and terminated investigations is a fraction of the average calculated on the basis of the total number of acts, while the rate of indictments is significantly higher. The significantly better indicators can be partly explained by the targeted activities of the intelligence agencies, namely the explicit intelligence activities of the NPS targeting corruption offences and it can also be explained by the fact that the investigation of corruption offences are conducted exclusively by a specialised body, the Central Chief Prosecution Office of Investigation. Investigation of corruption acts in the business sector falls under the competence of the county-level police headquarters.

#### *Data provided by the NOJ*

In 2024, the Buda Central District Court received 80 criminal cases that were initiated due to a major crime related to the exercise of public authority or the management of public assets. In 7 of these cases, the court upheld the motion for review, i.e. it annulled the decision of the investigating authority; while in 73 cases the court rejected the motion for review or the case was closed by the court in other ways that were not substantive. On 31 December 2024, 5 such cases remained pending.

In 2025, these indicators developed in a similar way: 85 cases were received, of which the court upheld the motion for review in 7 cases and rejected or terminated the procedure in 71 cases. As of 31 December 2025, 7 such cases remained pending.

#### *Statistical data on corruption criminal offences*

Statistical data on corruption criminal offences are included in the annexes to this document. Please note that the administrative data (see Annex 1) and VIR data (see Annex 3) are not yet final. The administrative data will be considered final after 15 January 2025, and the VIR data after 25 January 2025, together with any modifications made by that time.

Annex 1 contains data generated from administrative systems in relation to investigations,

Annex 2 contains data generated from the ENyÜBS-KBS system in relation to initiated proceedings, Annex 3 contains data generated from the ENyÜBS-BBS system in relation to registered crimes, Annex 4 contains data generated from the ENyÜBS-BBS system in relation to registered perpetrators, Annex 5 contains data generated by the ENyÜBS-BBS system concerning procedural decisions in completed proceedings, while Annex 6 contains data generated by the VIR system concerning defendants who have been tried by a final court decision.

The data sources and information related to the interpretation of the data (e.g. selection criteria, comments) are provided in the appendices below the tables. With regard to ENyÜBS, Annex 2 contains the final data set.

#### Potential obstacles to investigating and prosecuting high-level and complex corruption crimes

With regard to the so-called “high-level” corruption, it should be noted that the institutions of the European Union attach particular importance to the situation of “high-level” corruption, and their decisions are also influenced by opinion poll data on this issue. However, the concept of high-level corruption does not exist in criminal law or in criminal statistics, nor has it been defined by the European Commission, which does not collect statistical data of this kind. On the other hand, criminal proceedings that the public identifies as high-level corruption cases are often reported in the media.

In general, it should be noted that there are no legislative or law-enforcement obstacles regarding the effective and timely conduct of criminal proceedings for corruption offences in Hungary, and any suggestions or assumptions to the contrary that lack factual basis should be firmly rejected. In this regard, neither the rules of immunity nor the regulation of limitations represent an obstacle to criminal prosecution. Concerning the effectiveness of domestic criminal law enforcement, we refer to the compilation sent by the Office of the Prosecutor General to the European Commission in 2025 (reference number: KSB.5324/2024/8-II), which describes a number of so-called high-level corruption cases.

#### Other: measures in the field of public procurement

In 2025 the Electronic Public Procurement System (hereinafter: EPS) was further improved to ensure more transparent access to public procurement related information and materials on its website. This means that instead of being published in the ‘news section’, public procurement related information and materials such as notices, guidance materials and other documents issued by the minister responsible for public procurement has become accessible through a separate drop-down menu on the website.<sup>49</sup> This ensures that all stakeholders can find public procurement related materials much easier, helping them to conduct public procurement procedures more smoothly. The measure fulfils both users’ expectations and a recommendation made by the Integrity Authority in its annual integrity report published in 2024 (p. 58 of the report<sup>50</sup>).

In addition, a number of other measures ensure an increase in transparency and competition in the field of public procurement.

- Since 2022 the Hungarian Government operates a ‘*performance measurement framework*’ to assess the efficiency and cost-effectiveness of public procurements, based

<sup>49</sup> See at: <https://ekr.gov.hu/cms/szakmai-anyagok?page=1>.

<sup>50</sup> See the report at the following link: <https://integritashatosag.hu/jelentesek/>.

on a comprehensive system of indicators used on the national level to measure performance of the public procurement system. The primary goal of the framework is to support policymakers to understand the public procurement market and to identify weaknesses in its operation which call for policy action. A comprehensive report using 120 indicators and several sub-indicators is published annually by the Government. These indicators inter alia present data on competition in public procurement, transparency of procedures, remedies, infringements identified and the practices of central purchasing bodies. In 2025 the indicators were further refined in order to take into account experiences with data analysis and the views of the Working Group of the framework composed of representatives of NGOs and independent public procurement experts. Data collection on central purchasing bodies – besides the Digital Government Agency (hereinafter: DKÜ), the Public Procurement and Supply Directorate (hereinafter: KEF) and the National Communications Office (hereinafter: NKOH) – was extended to the Ludovika University of Public Service which is responsible for the centralised procurement of training courses.

- The Action Plan on increasing competition in public procurement<sup>51</sup> (hereinafter: Public Procurement Action Plan) has been supplemented with further measures in 2025. Regarding the implementation of that action plan, progress was made in 2025, considering the following new measures:
  - The 3 main central purchasing bodies (KEF, DKÜ, NKOH) have developed an online system through which the contracting authorities using their services will be able to provide feedback on how satisfied they were with the service. These are set to enter into operation in 2026.
  - The minister responsible for public procurement collected those contracting authorities that have most frequently used the procedure provided in Section 115 of the Public Procurement Act (according to which 5 economic operators can be invited to tender directly by the contracting authority in case of works below HUF 300 million) in a 12 month period and forwarded this list to the general control bodies (State Audit Office, Government Control Office), which will then be able to build into their audit plans the closer control of these types of procedures.
  - The Public Procurement Authority prepared an update and revision of the guidance on dynamic purchasing systems, with special focus on how to improve competition in the context of purchases based on dynamic purchasing systems.
- Besides the above, implementation of the following measures set out in the Public Procurement Action Plan continued in 2025:
  - SMEs continued to receive training on public procurement (including procedures, remedies, integrity and the use of the EPS). E-learning courses were available, and also 5 in-person training occasions were held across different cities in Hungary.
  - The series of workshops and conferences on public procurement and integrity continued to be organised by the Ludovika University of Public Service. In 2025, two online and one in-person event was held.
- As from 1 September 2025, new rules on the control of lower value public procurements (below EU thresholds for goods and services and below HUF 300 million for works) funded from EU funds came into effect, under which the control of compliance with public procurement legislation is carried out centrally by the Department for Public Procurement Control (hereinafter: DPPC) of the National Development Centre, rather

<sup>51</sup> Adopted by the Hungarian Government by Government Decision No. 1118/2023 (of 31 March) *on the action plan (2023 to 2026) to increase the level of competition in public procurements*.

than individual Managing Authorities. This is the same system which has been in place for the control of higher value procurements. Through this change, control can be more effective and consistent, thus resulting in better compliance with the public procurement rules and principles for all public procurements, regardless of value. We note that the work of the DPPC was assessed by European Commission auditors recently in its 2025 thematic audits (Audits No DAC514HU3121 and No DAC521HU3122).

- As from 1 January 2026, new rules come into effect in the context of the obligation for tenderers in public procurement procedures to name their beneficial owners. While such an obligation has existed before, the scope of the obligation in the Public Procurement Act will expressly include the relevant persons in fiduciary asset management contracts and natural persons behind private investment funds [Section 62(1) point k) subpoint kb) of the Public Procurement Act, referring to subpoints e) and g) of Section 3, point 38 of Act LIII of 2017 *on the Prevention and Combating of Money Laundering and Terrorist Financing*<sup>52</sup>]. This will contribute to more transparency in case of contracts won by companies owned by private investment funds or persons involved in a fiduciary asset management contract. This also fulfils a recommendation made by the Integrity Authority in its annual integrity report published in 2024 (on p. 78 of the report).

#### *Share of single-bid public procurements*

According to Hungary's Recovery and Resilience Plan, the compliance with the Single Market Scoreboard methodology and every individual data provision to the Commission and to the public regarding the share of single-bid public procurements shall be audited by the Directorate-General for Audit of European Funds. The final data concerning the year 2025 will be published by 15 February, in accordance with Government Decree No. 63/2022 (of 28 February) *on measures to reduce the number of single-bid public procurements*. The previous analyses are publicly available at the website.<sup>53</sup>

### **III. Media Pluralism and Media Freedom**

#### General observations on the 2025 Rule of Law Report

With reference to the written inputs provided for the previous Rule of Law Reports, as well as to the observations submitted to the Commission on the draft Hungarian chapter of the previous Rule of Law Reports, Hungary firmly rejects the 2025 Rule of Law Report's (and the previous reports') assessment concerning the alleged lack of independence of the Hungarian media regulatory authority, which reflects a selective and incomplete reading of the applicable legal framework. As it has been consistently and clearly demonstrated, Act CLXXXV of 2010 *on Media Services and Mass Media* (hereinafter: Media Act) provides comprehensive and effective guarantees of the authority's organisational, functional and financial independence, fully in line with Article 30 of Directive (EU) 2018/1808 (AVMS Directive).

The Report disregards the explicit provisions of Hungarian law according to which the members of the Media Council are subject exclusively to the law and are not amenable to instruction in the performance of their duties. The omission of these legally binding

<sup>52</sup> <https://njt.hu/jogszabaly/2015-143-00-00.75#CI>

<sup>53</sup> See at the following link: <https://ekr.gov.hu/cms/szakmai-anyagok/632022-ii-28-korm-rendelet-anyagai/elemzes-az-egyajanlatos-kozbeszerzesek-alakulasarol?page=1>.

safeguards raises serious concerns as to the objectivity and methodological soundness of the conclusions drawn.

In the absence of any concrete evidence demonstrating an actual or potential breach of functional independence, the Report's assertions remain unsubstantiated. Accordingly, claims suggesting non-compliance with EU law are without legal merit and cannot constitute a valid basis for calling into question the Hungarian legal framework or for recommending legislative amendments.

Regarding the fair distribution of state advertising, Hungary reiterates its long-standing position that the existing national regulatory framework provides adequate and effective safeguards to ensure the fair, non-discriminatory and transparent allocation of advertising expenditures by the state and state-owned enterprises. The Report fails to identify any concrete deficiency in the applicable rules or their implementation that would substantiate its implications to the contrary.

Regarding the transparency of media companies, as it is acknowledged by the Report itself, ownership information of media companies is publicly accessible through the official business register. Any suggestion that transparency is lacking in this regard is therefore factually incorrect and demonstrates a misrepresentation of readily verifiable information. The rules described above, which ensure transparency in Hungarian media ownership, are fully in line with the relevant provision of the AVMS Directive.

Regarding the independence of public service media, Hungary maintains its consistent position that the organisation, governance and development of public service media fall within the exclusive competence of the Member States, in full respect of EU law. The Report's claim that the organisational and funding structure of public service media is opaque or overly complex is made without supporting evidence and is therefore rejected.

Regarding the safety of journalists, the Report itself confirms that Hungary constitutes a safe environment for journalists and media professionals in comparison with other countries. This factual acknowledgment stands in clear contrast to the Report's broader narrative and further calls into question the coherence of its overall assessment.

Regarding safeguards against state or political interference, Hungary fully recognizes and guarantees the freedom of the press and media pluralism as fundamental constitutional values. These freedoms explicitly entail independence from the State, as enshrined in the Fundamental Law of Hungary and further detailed in Act CIV of 2010 *on Freedom of the Press and on the Basic Rules Relating to Media Content*. The existing legal framework provides clear and binding safeguards to ensure editorial independence across both private and public media, and no evidence has been presented to suggest otherwise. A practical example of this is the so-called "Government Info" press conference, where the Hungarian Government's decisions and announcements are presented to the public. Government Info begins with a brief overview of government decisions, followed by a wide range of questions from journalists. Questions can be asked on any topic related to the Government and usually lasts 2 hours per occasion.

With regard to public service media, the appointment, dismissal and mandate of heads of management and members of governing bodies are governed by precise statutory rules designed to safeguard their independence and legal certainty. The organisational, financial and operational autonomy of public service media is ensured through clearly defined legal provisions, including transparent reporting obligations and a regulated system for the allocation of resources. Claims alleging deficiencies in these safeguards are not supported by substantiated evidence.

Furthermore, Hungarian legislation provides comprehensive and detailed rules applicable to media service providers, including provisions on the granting, renewal and termination of licences, company operation, capital entry requirements, media concentration and corporate governance, as laid down in the Media Act. These procedures are subject to effective judicial review, ensuring the availability of legal remedies in all relevant cases.

In light of the above, Hungary considers that its legal framework offers robust safeguards against state or political interference, fully in line with national constitutional requirements and applicable EU law.

Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information):

Act LXXXV of 2024 *on the amendment of certain laws for the purpose of deregulation in order to ensure legal competitiveness* (hereinafter: Act LXXXV of 2024) amended the Information Act. The amendments entered into force on 1 January 2025.

Act LXXXV of 2024 redefined the definition of data of public interest [Section 3(5) of the Information Act] as follows (*emphasis added*):

*„5. data of public interest means information or data other than personal data, recorded through any method or in any form, processed by, and pertaining to the activities of, or generated in the context of the performance of public duties by, an organ, **organization or person performing state or local government duties as well as other public duties – including bodies, organizations, or persons taking over such tasks** – defined by law, irrespective of the method in which it is processed and regardless of its singular or collective nature; in particular, data concerning subject-matter competence, territorial competence, organisational structure, professional activities and the evaluation of such activities, including their effectiveness, the type of data held and the laws governing its operation, as well as financial management and concluded contracts;*

This amendment further broadened the scope of the definition by clarifying that the Information Act is also applicable to organizations, and it is also applicable when an organ or organization takes over a public task.

Act LXXXV of 2024 also modified the personal scope of the rules on Central Information Register of Public Data (established in 2022, which contains up-to-date information on the use of public funds). Based on the amendment, as it was underlined above, all legal persons registered in the general ledger within the meaning of the Public Finance Act are also required to publish their data on the Central Register. Further minor clarifications were also made in order to standardize the disclosure of data controllers subject to disclosure.

Act CXXVIII of 2025 *on the amendment of the Act on the Protection of Classified Information and other related acts, and on the amendment of acts related to the amendment of Act CXXV of 1995 on National Security Services in connection with national security screening* (hereinafter referred to as “Act CXXVIII of 2025”) also amends certain provisions of the Information Act and Act CLV of 2009 *on the protection of classified data* (hereinafter: Act on the Protection of Classified Information). The amendments will enter into force on 22 February 2026.

The amendment broadens the rights of data requesters. In the event when a request concerns

classified data, the classifier will be required to review the classification of such data within a maximum of 21 days. According to the amendment, it would also be mandatory to review the classification even without a request for data if there has been a change in the conditions of classification. In the event, where the requested data of public interest is also classified national data, the classifier would have to carry out a review in accordance with the provisions of the Act on the Protection of Classified Information, so their request could not be automatically rejected. If the data controller is also the classifier, it would have to carry out the classification on its own. If the data controller different in person from the certifier, the data controller must immediately take steps to inform the certifier and ask for an immediate review of the classification. The procedure would remain unchanged in the subsequent stages. If the requesting party turns to a court against the refusal of his or her request, the court – with the suspension of its own proceedings – shall initiate the so-called authority procedure for the supervision of data classification before the National Authority for Data Protection and Freedom of Information (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság, hereinafter: NAIH), as laid down in Subtitle 33 of the Information Act. If the requesting party turns to the NAIH instead turning to the court, the NAIH will conduct the same proceeding *ex officio*. In this procedure, the NAIH also has the right to review (including the modification of) the classification of the requested data. It should be emphasized that in the so-called authority procedure for the supervision of data classification, an independent judicial remedy may also be sought against this decision of the NAIH.

*Statistical and qualitative data as regards the length of access to documents cases, including enforcement of judicial decisions*

In 2024, the number of first-instance lawsuit for the disclosure of data of public interest initiated in Hungarian courts was 636. In the year under review, the courts completed 660 cases, and on 31 December 2024, 66 cases were still pending. In 2024, the average duration of the 660 cases completed in the first instance was 76 days.

In 2025, the parties initiated fewer litigation proceedings, a total of 508, in connection with the disclosure of data of public interest. The courts closed 534 first-instance cases in the year under review, with 40 cases pending on 31 December 2025. The average duration of proceedings at first instance completed in 2025 was 74 days.

The NOJ does not collect data on the enforcement of final decisions.

The NAIH

does not collect and does not have data regarding the length of access to documents cases or enforcement of judicial decisions. However, the Budapest-Capital Regional Court provided a publicly available answer<sup>54</sup> to a request for data of public interest including data on the length of access to documents cases. According to the data provided by the Budapest-Capital Regional Court in 63 cases, the court issued the first instant decision within 3 months, in 4 cases between 3-6 months, in 1 case between 6-12 months. Compared to data on the lengths of court cases in 2020, the Budapest-Capital Regional Court issued its decisions much more quickly in 2025 than in 2020.

If by „access to documents cases” we mean data requests as well, the average response period of public bodies to requests for data of public interest was as follows in 2024<sup>55</sup>:

<sup>54</sup> See: [https://kimittud.hu/request/28297/response/40265/attach/3/0500%20001.pdf?cookie\\_passthrough=1](https://kimittud.hu/request/28297/response/40265/attach/3/0500%20001.pdf?cookie_passthrough=1).

<sup>55</sup> See at: [https://www.naih.hu/files/annual\\_report\\_2024\\_07\\_en.pdf](https://www.naih.hu/files/annual_report_2024_07_en.pdf), p. 77.

- the average response period was 15 days in the case of 20% of the organs [213 organs],
- the average response period was less than 15 days in the case of 39% of the organs [394 organs],
- the average response period was more than 15 days in the case of 41% of the organs [425 organs].

#### Other – Comments on the Hungarian Chapter of the 2025 Report

i) The report notes that while it welcomes the progress achieved with regard to freedom of information, “*the enforcement of court orders granting access to documents remains a challenge*” (on page 21, see also footnote 157). The report cites a single source for this assertion, according to which the Committee of Ministers of the Council of Europe, on 5 December 2024, in its judgment in the *Kenedi v Hungary* case, called on the Hungarian authorities to adopt additional targeted general measures to address the recurring reluctance of state authorities to comply with domestic courts’ orders granting access to documents, and to ensure that effective and genuinely coercive enforcement tools are available for the implementation of such orders.

In this context, we emphasize that, in Hungary, an appropriate legal framework exists for the enforcement of judgments (including judgments related to access to data of public interest), which is regulated by Act LIII of 1994 *on Judicial Enforcement*, under which the imposition of fines is also possible. In addition, Section 220 of the CC expressly classifies as a criminal offence the concealment of data of public interest from the data requester, or the failure to comply with the obligation to provide information after a court has issued a final and binding decision ordering the disclosure of data of public interest.

In this regard, we also note that officials acting on behalf of the Council of Europe paid a visit to Budapest on 21 November 2025, during which they held detailed consultations with staff of the Ministry of Justice and with a judge of the Budapest Metropolitan Court who is specialized in access to data of public interest, concerning the enforcement of the *Kenedi* judgment. During the meeting, both the court judge and the ministry clarified in detail that no general conclusion can be drawn from the deficiencies identified in connection with the *Kenedi* judgment (regarding its enforcement) to the effect that there are systemic shortcomings in the enforcement of such judgments. On the one hand, the proceedings have been conducted very swiftly since 2022 (within only a few months), and on the other hand, Hungary has an adequate framework in place for the enforcement of judgments, including the related criminal-law consequences. The ministry also indicated that – as acknowledged by the 2025 Report – Hungary is a party to the so-called Tromsø Convention, and that neither the mechanisms operating within the framework of that convention nor the report assessing its implementation have identified any deficiencies amounting to a lack of enforcement of judgments.

In light of all the above, we are of the opinion that merely referring to the fact that the Committee of Ministers of the Council of Europe identified shortcomings in connection with the enforcement of one previous judgment is not sufficient to draw general conclusions concerning the system as a whole. In fact, the practice points to the opposite conclusion, namely that final and binding judgments are fully complied with by governmental and state bodies, and that they also respond appropriately to the non-binding calls issued by the NAIH.

ii) The Commission found in the Hungarian chapter of its 2025 Report that “*public access to anonymised official documents of a file in administrative proceedings has been removed by a precedent decision of the Kúria*” (on page 21 and see footnote 158).

In the judgment referred in the related footnote, the Kúria ruled exclusively on the interpretation that the provisions of the Code of Administrative Procedure and the Information Act must be construed jointly in such a way that documents and data generated in administrative authority proceedings are accessible in accordance with the document-access rules of the Code of Administrative Procedure.

Given that, pursuant to Section 33(5) of the Code of Administrative Procedure, following the conclusion of the procedure any final decision that has become definitive and does not contain personal or protected data, as well as any order annulling a first-instance decision and instructing the authority that issued the first-instance decision to conduct new proceedings, may be accessed by anyone without restriction, the Kúria's decision did not introduce any new or substantive limitation on freedom of information.

It must be noted that the Government cannot in any event be held responsible for the courts' interpretation of the law, and since the Kúria merely sought to bring to a close a legal-interpretation dispute that had persisted for many years. In doing so, it in fact enhanced legal certainty by making it clear to all how parallel and competing regimes (freedom of information and administrative procedures) are to be reconciled in a manner that ensures the appropriate protection of both procedural interests and freedom of information.

#### **IV. Other institutional issues related to check and balances**

Framework, policy and use of impact assessments and evidence-based policy-making, stakeholders' / public consultations (including rules and practices on the transparent participation of civil society in policy development and decision-making processes, and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation)

The Hungarian Government fulfilled the relevant commitment made in Hungary's Recovery and Resilience Plan (RRP) in 2025 as well: 96% of the legislation initiated by the Government were announced following public consultation<sup>56</sup>, i.e. the proportion of draft legislation submitted to public consultation exceeded the 90% level set in the RRP and implemented by Act CXXXI of 2010 *on public participation in the drafting of legislation* (Section 5/A, which entered into force on 26 October 2022).

As it was reported earlier, the National Economic and Social Council (Nemzeti Gazdasági és Társadalmi Tanács, hereinafter: NGTT) was established with the aim of operating as an advisory and consultative body that discusses general economic and social policy issues affecting society as a whole and contributes through its proposals and opinions to the preparation of major economic and social policy decisions. The NGTT brings together a wide range of actors representing society, including employees' and employers' representative organisations, interest advocacy organisations, Hungarian representatives of national economic chambers, civil society organisations active in public life, recognised churches, as well as domestic and international representatives of science and the arts. The active operation of the NGTT is demonstrated by the fact that it held seven plenary sessions in 2025 (and six plenary sessions in 2024), which clearly reflects its strengthened role and the commitment to institutionalised dialogue.

A further significant step forward was the strengthening of the NGTT's professional

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<sup>56</sup> As of 18 December 2025.

activities through the expansion of its working group structure. In 2024, the number of working groups operating within the framework of the Council was expanded to 11 permanent professional working groups, as follows: Equal Opportunities and Social Affairs Working Group, Economic and Development Working Group, Labour Market Working Group, Labour Law and Occupational Safety Working Group, Education and Vocational Training Working Group, Cultural Working Group, Public Engagement Working Group, Climate Crisis Working Group, International Working Group, Agriculture and Rural Development Working Group, and Food Safety Working Group.

The activities of the working groups substantially support the deepening of professional consultations and the development of a clearer professional focus.

The NGTT's annual work plan for 2026 was adopted, which is built around six priority thematic areas. This approach facilitates a more structured discussion of individual policy issues.

The professional dialogue between the NGTT and the relevant ministries is continuous and balanced. The effectiveness of the NGTT's operation is well demonstrated by the fact that actors from the civil and non-profit sector play a determining consultative role in Hungary's policy making and decision making processes, particularly in the areas of social consultation and stakeholder involvement.

Rules and use of fast-track procedures and emergency procedure (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions)

The number of special legal order laws decreased significantly in 2025 compared to the 202 laws in 2023, but a decrease can also be seen compared to 2024, as 97 special legal order laws were adopted in 2024 and 81<sup>57</sup> special legal order laws were adopted in 2025, representing a 60% decrease compared to 2023 and a 16% decrease compared to 2024.

Laws adopted by Parliament in 2025 in urgent deliberations or under exceptional procedures

There were no changes in the regulation of special procedures that "expedite" the legislative process during the period under review. These special procedures are the urgent procedure, the exceptional procedure and the derogation from the provisions of the rules of procedure of the House.

The table below provides information on the number of individual motions adopted under special procedures in 2025, as well as the total number of motions adopted, and their relative percentages.

#### I. Bills

|                                                           | Number of bills adopted | Percentage of bills adopted through special procedure compared to the total number of adopted bills |
|-----------------------------------------------------------|-------------------------|-----------------------------------------------------------------------------------------------------|
| Adopted by derogation from the provisions of the Rules of | 1                       | 0.7%                                                                                                |

<sup>57</sup> As of 18 December 2025.

|                                       |     |        |
|---------------------------------------|-----|--------|
| Procedure                             |     |        |
| Adopted by exceptional procedure      | 5   | 3.6%   |
| Adopted by urgent procedure           | 2   | 1.5%   |
| Total number of bills adopted in 2025 | 137 | 100.0% |

## II. Proposals for resolution

|                                                                     | Number of proposals for resolution adopted | Percentage of proposals for resolution adopted through special procedure compared to the total number of adopted decisions |
|---------------------------------------------------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| Adopted by derogation from the provisions of the Rules of Procedure | 0                                          | 0.0%                                                                                                                       |
| Adopted by exceptional procedure                                    | 1                                          | 1.9%                                                                                                                       |
| Adopted by urgent procedure                                         | 0                                          | 0.0%                                                                                                                       |
| Total number of proposals for resolution adopted in 2025            | 53                                         | 100.0%                                                                                                                     |

|                                                                                                          |      |
|----------------------------------------------------------------------------------------------------------|------|
| Total number of laws and resolutions adopted in 2025                                                     | 190  |
| Percentage of proposals for law and resolution adopted through special procedure (compared to the total) | 4.7% |

### *List of bills adopted in 2025 under urgent procedure:*

- Bill No. T/12109 on the amendment to Act LXXXVII of 2013 *on the transparency of campaign costs for the election of members of the National Assembly* (not a government bill, but an independent motion by Members of Parliament – *promulgated as Act LXVIII of 2025*)
- Bill No. T/13252 on the granting of a loan to avoid the bankruptcy of the capital city municipality (*promulgated as Act CXXXIV of 2025*)

### *List of bills adopted in 2025 under exceptional procedure:*

- Bill No. T/11201 on the amendment to Act LV of 2018 *on the right of assembly in relation to the protection of children and related acts* (not a government bill, but an independent motion by Members of Parliament – *promulgated as Act III of 2025*)
- Bill No. T/12108 on the provision of public services in the usage fee system and the toll system and on the amendment of certain related laws (*promulgated as Act LVI of 2025*)
- Bill No. T/13083 on announcement of the Agreement between the Government of Hungary and the United Nations on the status of the United Nations University, a higher education institution focused on the application of foresight and foresight methodologies in issues of peace, security and transformative technologies (*promulgated as Act CVIII of 2025*)

- Bill No. T/13110 on measures to reduce the tax burden on businesses (promulgated as Act LXXXIV of 2025)
- Bill No. T/13270 on the amendment to Act LVII of 1996 *on the Prohibition of Unfair Market Practices and Restriction of Competition* (promulgated as Act XCVIII of 2025)

Further information provided at the request of the European Commission

The European Commission asked to provide the list of those acts adopted in 2025 that contain provisions, which were inserted by the Committee on Legislation of the Parliament without debate in plenary.

According to Hungarian public law, with particular regard to the provisions of the Resolution of the National Assembly No. 10/2014 (of 24 February) on certain provisions of the Rules of Procedure, there can be no amendment that is not debated in plenary by the Parliament.

The stages of the legislative process are as follows: general debate, detailed debate phase, the Committee on Legislation (hereinafter: CoL) procedure, debate on committee reports and on summarising proposal for amendment (the so-called second reading), decision on the summarising proposal for amendment and final vote. The general debate and the second reading take place before the plenary session of the Parliament, and the decision on the summarising proposal for amendment submitted by the CoL - even if it is rejected in its entirety - and on the text of the adopted law, is always made by the plenary session of the National Assembly, in conclusion of the legislative process.

Although the rules allow the discussing committee or the CoL to express its intention to make its own amendments during the detailed debate stage and the CoL's procedure, the Parliament shall, in all cases, debate the amendments submitted by the committees prior to making a decision. During the debate, the rapporteur designated by the CoL and by the discussing committee and, if any, the rapporteurs of minority opinions may speak in specific order, then after the committee speeches followed by members of parliamentary groups, national minority Members, independent members, - in the case of EU agenda items - members of the European Parliament, and - in the case of agenda items focused on matters regarding national minorities - national minority advocates. The sponsor of the legislative proposal and, if it is not the Government, the Government's representative may also speak in the debate.

Thus, CoL debates each proposed amendment prior to its adoption. After being approved by the CoL, the proposed amendment is submitted to the Parliament as a summary amendment proposal, which is debated by the Parliament in a plenary session as a separate agenda item (debate on committee reports and summary amendment proposals). Hungarian public law rules also guarantee the debate on the summary amendment proposal in the case of bills debated in fast-track procedure and in exceptional procedure (in the case of exceptional procedure, in the framework of a so-called consolidated debate).

Thus, in accordance with Hungarian public law, the CoL did not submit any amendments to the laws adopted in 2025 without a plenary debate in the Parliament.

Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination

Legal certainty and the stability of the legal framework are ensured by Article B) of the Fundamental Law of Hungary ("*Hungary shall be an independent, democratic rule-of-law State*"), non-discrimination is guaranteed by Article XV ["(1) *Everyone shall be equal before*"]

*the law. Every human being shall have legal capacity. (2) Hungary shall guarantee fundamental rights to everyone without discrimination and in particular without discrimination on the grounds of race, colour, sex, disability, language, religion, political or other opinion, national or social origin, property, birth or any other status.”].*

The Constitutional Court of Hungary, through its competences, offers protection to Articles B) and XV of the Fundamental Law. In preliminary norm control and posterior norm control cases, all elements of the rule of law and legal certainty are protected, in constitutional complaint procedures, the Constitutional Court protects the prohibition of retroactive effect and the requirement of adequate preparation time and all elements of non-discrimination.

The Constitutional Court annulled two legal regulations due to the violation of Article B) [Decision no. 3/2025. (V. 29.) AB of the Constitutional Court of Hungary, Decision no. 10/2025. (IX. 25.) AB of the Constitutional Court of Hungary] and annulled two legal regulations due to the violation of the non-discrimination clause [Decision no. 1/2025. (II. 27.) AB of the Constitutional Court and Decision no. 12/2025. (X. 20.) of the Constitutional Court].

In 2022, several legislative amendments were made specifically based on the Venice Commission’s recommendations. The establishment of a single permanent Uniformity Complaint Panel acting in two formations (Formation No. 1 and Formation No. 2) operating at the Kúria was a fundamental change from 1 January 2022 and so was the recording of their composition in the case allocation order. Each formation operates with 21 members. The panel may be expanded with members of any of the Kúria’s judicial departments, and that all three departments, that is, the full bench, may also act as a Uniformity Panel. The first category comprises the case-specific decisions of the Kúria, adopted in second-instance proceedings, review proceedings and complaint proceedings. These decisions are binding in the individual case in which they are delivered; however, lower courts may depart from the legal interpretation contained in such decisions, provided that they give reasoning for doing so. Such a departure nevertheless constitutes grounds for judicial review, meaning that, in the course of appellate or review proceedings, the Kúria may decide whether to accept the departure or to uphold its earlier interpretation. This model simultaneously ensures the unity of the law and the preservation of judicial independence, since binding legal interpretation does not exclude the possibility of adopting a professionally well-reasoned divergent legal position. The functioning of this institutional arrangement has also been acknowledged by the CJEU.<sup>58</sup>

Accordingly, the new procedural mechanism was established in line with the recommendations of the Venice Commission.<sup>59</sup>

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<sup>58</sup> In its judgment in *Global Ink Trade*, the Court stated, in paragraph [30], that [...] the legal rulings of a higher national court if it considers, in the light of the interpretation of a provision of EU law provided by the Court in the form of a judgment or a reasoned order within the meaning of Article 99 of its Rules of Procedure, that those rulings are not consistent with EU law. That principle does not, however, preclude national legislation that merely requires lower national courts to state reasons for any departure from those rulings.

<sup>59</sup> CDL-AD(2010)004 : [71] ... Under a system of judicial independence the higher courts ensure the consistency of case law throughout the territory of the country through their decisions in the individual cases. See the recommendations at the following link: [https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2010\)004-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2010)004-e).

CDL-AD(2018)011): [28] Useful mechanisms and models to establish a body of reasoned case law should be explored and consideration should be given to new ways of encouraging the application of precedent, all of which should be the task of the judiciary. This will result in more consistency in cases and engender greater public trust in the judicial system and more optimism that it will provide litigants with real remedies before the Serbian Courts.

The other procedure – an older one, rooted in the traditions of Hungarian law – is the uniformity decision (UD) adopted upon a preliminary motion for uniformity. This procedure may be initiated either by the adjudicating judicial panel of the Kúria itself, where it intends to depart from the Kúria’s earlier interpretation of the law, or by the President, a Vice-President, Head of Chamber of the Kúria, or the Chief Prosecutor where it comes to their attention that courts are interpreting the same statutory provision in divergent ways. A uniformity decision adopted in this procedure is, pursuant to Article 25 of the Fundamental Law, binding on the Kúria and on all lower courts, from which they may not depart.<sup>60</sup>

There is a special *sui generis* remedial procedure, the uniformity complaint, which is available only when the Kúria departs from its own earlier decision that carries precedential force, or where a lower court has departed from such precedential case-law and that departure was not remedied by the Kúria in review proceedings. In such a case, the complainant may initiate a uniformity complaint, but only where the intended departure concerns another decision of the Kúria. A uniformity complaint cannot be initiated in relation to a lower court’s judgment, for which the ordinary system of remedies, including review proceedings, provides the appropriate avenue for correction. Exceptionally, the two types of procedures may be interconnected. In such cases, in proceedings initiated by way of a uniformity complaint, the Kúria adopts a so-called uniformity-effect complaint decision. The binding force of such a decision is identical to that of a uniformity decisions.<sup>61</sup>

#### Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight

The Fifteenth Amendment to the Fundamental Law changed the constitutional rules on the ‘state of danger’ as of 1 January 2026. As a result, the Government will only be authorized to take extraordinary measures in state of danger as provided for by cardinal law, and may only suspend or derogate from the provisions of acts, with the authorization of a two-thirds majority of the Parliament. To this end, the Parliament may authorize the Government directly for the purpose of the prevention, management and elimination of the event triggering the state of danger, as well as for the prevention and mitigation of its harmful effects; in matters specified by law or in general terms. Accordingly, the Parliament may in each case consider which legal regulations may be derogated from in the given situation in view of the circumstances causing the danger, and grant the Government the power to issue regulations exclusively with this in mind. A further limitation on the drafting of decrees adopted by the Government during the state of danger is that the Government shall repeal any decree that does not comply with the regulatory framework specified in the authorization. It follows from this provision that the Parliament may, even after granting the authorization, amend both the subjects covered by it and the duration of the authorization. Furthermore, under the new rules, the Government’s decree adopted during the state of danger may not directly affect the scope of the legislation in force, only its application. The authorization to extend the state of danger may now be granted for a maximum of six months at any given point in time, and the same applies to the suspension of laws and the initiation of authorization to deviate from them. As of 1 January 2026, the Parliament provide general

<sup>60</sup> It is worth noting that the wording of the Fundamental Law in this respect is essentially identical to that of the former Constitution, in force since 1998. See the document at the following link: [https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2018\)011-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2018)011-e).

<sup>61</sup> See: <https://constitutionaldiscourse.com/the-tarnkappe-of-judgment-the-binding/> „Historical and constitutional foundations”.

authorisation to the Government to suspend the application of certain acts or derogate from the provisions of acts during a state of danger.

Government Decree No. 424/2022 (of 28 October) *on the declaration of a state of danger and certain emergency rules in order to prevent and manage the armed conflict and humanitarian disaster in Ukraine, as well as their consequences in Hungary* [hereinafter: Government Decree 424/2022] declared a state of danger for the entire territory of Hungary from 1 November 2022.

As it was reported earlier, the Government may declare a state of danger for thirty days in the event of an armed conflict, war situation or humanitarian disaster in a neighboring country, as well as a serious event threatening the security of life and property – especially an elemental disaster or industrial accident – and in order to prevent their consequences.

The Government may extend the state of danger based on the authorization of the Parliament, if the circumstances that led to the declaration of the state of emergency continue to exist. The Parliament decides on the authorization with the vote of two-thirds of its present members.

Pursuant to Act No. XCIII of 2021 *on the coordination of defense and security activities*, the proposal initiating the Parliament's decision regarding the extension of the state of emergency may be aimed at granting the authorization for a maximum period of six months on occasion.

Since 2022, the Parliament has authorized six times by the Government Decree 424/2022 to extend the state of danger according to the decree, most recently the Government was authorized to extend the state of emergency until 13 May 2026.

The Government can practice the above powers in regulatory areas

- related to personal freedom and living conditions,
- related to economic and supply security,
- related to security restrictions affecting communities and informing the population,
- related to state and local government operations,
- related to the protection or restoration of legal order, public order and public safety,
- related to national defense and national mobilization,
- others not included in the list, which are directly related to the prevention, management, elimination of the event that caused the state of war, state of emergency, emergency, as well as the prevention and elimination of its harmful effects.

The Government may exercise its powers – to the extent necessary, in accordance with the event that caused the state of war, state of emergency, and in proportion to the goal to be achieved – for the purpose of preventing, dealing with, liquidating the event that caused the state of war, state of danger, as well as preventing and eliminating its harmful effects.

In a special legal order, for the purposes of the aforementioned list, the limitation of fundamental rights may only take place to the extent absolutely necessary in accordance with the event that triggered the special legal order, in proportion to the goal to be achieved.

In a special legal order, the suspension of fundamental rights can only take place if the restriction of fundamental rights is not sufficient for the legal purpose, and the prevention, management, liquidation of the event that triggered the special legal order, as well as the prevention and elimination of its harmful effects cannot be guaranteed in any other way.

The above requirements related to the limitation and suspension of fundamental rights cannot be deviated from, and the Government is obliged to continuously ensure their enforcement.

If the conditions for limiting or suspending the fundamental right do not exist, the Government is obliged to immediately ensure that the limitation or suspension of the fundamental right is lifted.

In the current emergency situation, the Government has taken extraordinary measures in three main areas for the purpose of:

- care, employment and education of asylum seekers from Ukraine,
- maintaining Hungary's energy security and economic stability,
- mitigating the effects of the European Union's sanctions policy, which concerns Hungary's economic interests and the burdens of Hungarian citizens.

#### *Asylum seekers from Ukraine*

Since 7 March 2022, Ukrainian citizens residing in Ukraine prior to 24 February 2022, stateless persons or non-Ukrainian third-country nationals who, prior to 24 February 2022, were under international protection or equivalent national protection, have the right to claim asylum status, along with the family members of all these persons. As a result of the Russian-Ukrainian conflict, the workload of both the body established to perform general police tasks and the foreign police body increased significantly. It is therefore extremely important to ensure adequate protection for those fleeing the war taking place in the neighborhood, so that foreigners who have already been in Europe in significant numbers illegally and do not need international protection, cannot take advantage of the migration pressure on the country.

#### *The crisis situation caused by mass immigration and its legal effects*

With the effect of 10 March 2016, the Government ordered a crisis situation caused by mass immigration for the entire territory of Hungary. The temporal validity of the decree was most recently extended by the Government until 7 March 2026.

The crisis situation caused by mass immigration makes it possible to apply special provisions of certain laws (for example, a special situation of the law on legal violations, a special procedural rule of the law on criminal procedure in the case of crimes related to the border closure, the cooperation of the Hungarian Defense Forces in guarding the state border).

#### *The reasons for the crisis situation caused by mass immigration*

The duration of ordering a crisis situation caused by mass immigration is a maximum of six months, which can be extended if the conditions for ordering a crisis situation caused by mass immigration met by the Government decree exist at the time of termination of the decree.

A mass immigration crisis situation may be declared if a migration-related circumstance arises that directly threatens the protection of the Hungarian external border or a 60-metre strip of Hungary's territory from the external border or the temporary security border, or directly endangers the public security, public order or public health of a settlement in Hungary, in particular if disturbances or acts of violence break out in that area or in a reception centre or other establishment for the accommodation of aliens in that settlement or in the outskirts thereof.

#### *Review by the Constitutional Court*

The constitutionality of the rules and the application of the rules of states of emergency can be reviewed by the Constitutional Court, based on petitions that meet the statutory requirements. The Constitutional Court has various competences in which it can perform the constitutional control of legal regulations: posterior norm control, judicial initiative or constitutional complaint procedure.

During the special legal order, the Constitutional Court has an even greater responsibility than in normal times, being the main guardian of the rule of law and the protector of fundamental rights. The Hungarian Fundamental Law clearly states that the functioning of the Constitutional Court cannot in any way be restricted - not even during the special legal order. Accordingly, the Constitutional Court regularly reviewed the constitutionality of the legislative changes adopted during the state of danger. Its primary duty is to protect the Fundamental Law and the individual rights enshrined in the Fundamental Law. The Constitutional Court requires that the main principles, that is, the principles of necessity and proportionality must be observed when preventive measures necessitate the restriction of fundamental rights. Any such restriction must be necessary, proportionate and justified by the extraordinary circumstances.

In 2025, the Constitutional Court deliberated in 24 cases, based on constitutional complaints, judicial initiative or posterior norm control petition, aiming at the constitutional review of emergency measures. In 9 cases, the petition was rejected on formal grounds (for example due to the fact that the content of the petition failed to meet statutory requirements) and in 15 cases it dismissed the procedure (because the challenged norm was repealed during the procedure). Therefore, unlike previous years, in 2025 there weren't any rulings on the merits regarding emergency measures.

#### Regime for constitutional review of laws

The Hungarian chapter of the 2025 Rule of Law Report contains the following statement (on p. 26.): *"The Constitutional Court does not have a case allocation scheme and is not bound by procedural deadlines when hearing constitutional complaints."*

This information is not correct.

As for the deadlines, although there is no deadline for the final decision taken in a constitutional complaint procedure, the Internal Rules of Procedure (Ügyrend) establishes internal deadlines that ensure to close cases within reasonable time.

Section 53(1) of the Internal Rules of Procedure of the Constitutional Court states that *"(i)n the case of a constitutional complaint the Constitutional Court shall decide in one-hundred and twenty days about the admissibility of the petition upon the Secretary General's notification on starting the procedure"*. Section 53(2) reads as follows: *"The judge rapporteur shall submit in one-hundred and eighty days the first draft to the body entitled to judge upon the case."*

The above-referred rules are also reflected in statistical data: the average time of procedure of constitutional complaints was 290 days in 2025 (it was 275 days in 2024; and in five years' average, between 2020 and 2024, it was 303 days), counted from the arrival of the petition to the Constitutional Court.

Therefore, the Constitutional Court ensured the effective and timely review of the challenged norms.

#### Independence, resources, capacity and powers (including effective access to relevant data)

of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

The independence, resources, and capacity of the OCFR are firmly established within Hungary's highest legal framework, specifically the Fundamental Law and Act CXI of 2011 *on the Commissioner for Fundamental Rights* (hereinafter: CFR Act). As the primary National Human Rights Institution (NHRI), the OCFR operates with a robust constitutional mandate that ensures sole accountability to the National Assembly, providing a stable foundation for institutional autonomy. This independence is further reinforced by the legal status of the CFR, whose appointment and operational powers comply with both constitutional guarantees and international standards. The CFR has demonstrated a proactive commitment to its mandate by expanding its domestic capacity through the operation of six regional offices in major cities such as Szeged, Debrecen, and Győr. These offices significantly enhance the institution's accessibility, particularly for rural and digitally excluded citizens.

In terms of functional capacity and powers, the CFR possesses broad authority to investigate improprieties, access relevant data, and issue recommendations to public authorities. The OCFR's effectiveness is evidenced by its high operational volumes, reflecting a high degree of public trust. The institution's influence is further highlighted by a compliance rate of approximately 90% regarding its recommendations, which are frequently integrated into legislative and policy adjustments. Furthermore, the OCFR has institutionalized its engagement with civil society through structured mechanisms like the Civil Consultative Body and the Disability Advisory Board, ensuring a diverse range of stakeholder voices informs its work.

In 2025, the CFR Act was supplemented with an additional safeguard provision, according to which, if the mandate of the CFR expires upon the completion of the term of office, the powers vested in the CFR shall continue to be exercised until the new Commissioner assumes office. This provision serves to ensure the institutional stability and procedural continuity of the institution, effectively preventing any jurisdictional vacuum or lapse in the protection of fundamental rights.

Regarding international accreditation and cooperation, the OCFR maintains that its current B-status evaluation by the UN Sub-Committee on Accreditation was based on procedural gaps that did not fully reflect its actual performance or constitutional specificities. Consequently, the CFR remains dedicated to regaining A-status through continued constructive dialogue and peer learning, such as recent cooperation projects with A-status institutions in Poland and the Netherlands. By consistently fulfilling its statutory reporting obligations and expanding its outreach initiatives, the OCFR continues to function as an effective, independent, and high-impact pillar of the Hungarian rights protection system.

Statistics/reports concerning the follow-up to recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies, and supreme audit institutions in the past year

#### *The CFR and OCFR*

Regarding the institutional follow-up to the findings of the CFR, the OCFR maintains a significant impact on the national legal framework. The CFR reports a compliance rate of approximately 90% from the entities and authorities to which recommendations are addressed. These recommendations serve as a primary catalyst for reform, as they are

frequently integrated into legislative amendments and policy adjustments designed to strengthen the protection of constitutional rights and the rule of law.

In accordance with statutory transparency requirements and the principle of accountability, the reports of the CFR and the joint reports issued with the Deputy Commissioners are public. These reports are accessible to the public and all interested parties directly from the homepage of the OCFR, as well as under the “Decisions” menu item for specific subject areas and categorized by year under the “Reports and Resolutions” menu item. The annual report submitted to the National Assembly by the CFR, pursuant to statutory obligations, ensures the traceability of the implementation of measures formulated in the issued reports. The annual report on the activities of the CFR and his Deputies, as accepted by the National Assembly, is published on the OCFR’s website.

### *The SAO*

In its reports, the SAO may make recommendations to the audited organisation, which is obliged to take action on the recommendations. If a recommendation is related to the audit report, the follow-up of the audit report includes the evaluation of the action plan sent by the audited organisation, the response to it, and the sending of a reply to the head of the audited organisation.

The implementation of the action plan related to the findings of the audit reports may be assessed by the SAO in the framework of a follow-up audit.

In 2025, the SAO prepared 163 reports, in which it made a total of 1 282 recommendations to the audited entities. The average number of recommendations per report is therefore 7.87. Unless a law prescribes the application of a more serious legal consequence, the President of the SAO may send a letter of warning to the head of the audited body if, during the audit process, he discovers an error or deficiency requiring immediate action, the treatment of which cannot wait until the publication of the SAO report containing the results of the audit. The illegal situation must be eliminated immediately, and any damage that may result from this must be prevented.

Due to the practice of the SAO, the audited entities can take action during the audit or within the 15-day comment period to remedy the identified violations of the law, i.e. the findings of the SAO can already be utilised during the audit.

The SAO reports on the utilization of its activities to the Parliament and the public within the framework of its annual report on its professional activities, institutional operation and financial management. The reports prepared on an annual basis (the most recent for [2024<sup>62</sup>](#)) are available on the SAO’s website.

Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

Since 2025, no legislative amendments occurred. In recent times, among the priority objectives of measures taken to develop and strengthen good administration are the expansion of access to public services, the extension and development of their digitalization, the acceleration of public service procedures, effective organizational functioning, the

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<sup>62</sup> The report is available at the following link: <https://www.asz.hu/files/12952.pdf>.

improvement of client relations, and significant formal and substantive deregulation for the purpose of renewing the system of tasks.

Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

In the limited-precedent system the decisions of the Uniformity Panel of the Kúria are in all cases linked to concrete, individual disputes, brought before the panel either at the request of the parties or at the initiative of the adjudicating judicial panel, as well as of persons designated by Section 33 of the Court Administration Act. This feature ensures that uniformity decisions [Sections 25, 40, and 41/D(5) of the Court Administration Act] are not issued merely as abstract, general guidelines but are adopted within the framework of a specific legal dispute, tailored to the facts and the precise legal question at stake.

Under Hungarian law, uniformity decisions do not address the content of EU law, as this competence remains with the CJEU. Lower courts and the panels of the Kúria are entitled to refer to the CJEU if they consider a uniformity decision to be contrary to EU law, as indeed occurred in the present case. As of 15 February 2026, the designation of the adjudicating body has been amended: instead of the former term “*Uniformity Complaint Panel*”, the term “*Uniformity Panel*” is now used.<sup>63</sup> This change reflects the fact that the panel is competent not only to adjudicate uniformity complaints, but also to act in uniformity proceedings initiated on the basis of a preliminary motion for a uniformity decision. Furthermore, if they deem the CJEU’s interpretation to differ from that contained in a uniformity decision, they may disregard the uniformity decision and follow the CJEU’s interpretation, even though both are binding. This conflict can be resolved through the system of remedies.

This structure ensures that conflicts between domestic uniformity mechanisms and EU law are eliminated through judicial review, without transforming uniformity decisions into instruments for interpreting EU law, confirmed by the CJEU in case RS (C-430/21),<sup>64</sup> Dunai (C-118/17),<sup>65</sup> and in the Opinion of Advocate General Villalón in Case C-173/09,<sup>66</sup> binding decisions of a supreme court aimed at ensuring uniform interpretation are compatible with EU law, provided they do not obstruct effective judicial protection or the right to make a reference under Article 267 TFEU.

Consequently, the Hungarian limited precedent system does not hinder the primacy or effectiveness of EU law. On the contrary, it reinforces it by ensuring that once EU law has been clarified by the CJEU, conflicting domestic precedents lose their binding force through established judicial review mechanisms, while the competence to interpret EU law remains exclusively with the CJEU.

The Constitutional Court has not yet initiated the preliminary ruling procedure (Art. 267 TFEU). Nevertheless, according to the practice of the Constitutional Court, in cases where the adjudication of a petition depended also on a question pending before the CJEU, it suspended its own procedure until the final decision of the CJEU [for example in cases n.

<sup>63</sup> See the provisions of Act XCII of 2025 *on amending the laws relating to private law* in Hungarian at the following link: <https://njt.hu/jogszabaly/2025-92-00-00>. .

<sup>64</sup> <https://eur-lex.europa.eu/legal-content/HU/TXT/?uri=CELEX%3A62021CJ0430>

<sup>65</sup> <https://curia.europa.eu/juris/document/document.jsf?text=&docid=211709&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=9956209>.

<sup>66</sup> <https://curia.europa.eu/juris/document/document.jsf?jsessionid=9ea7d2dc30ddb35f3ce035d40feab78e91ab7365c6d.e34KaxiLc3qMb40Rch0SaxyNchb0?text=&docid=79885&pageIndex=0&doclang=HU&mode=lst&dir=&occ=first&part=1&cid=88110>

3198/2018. (VI. 21.) Order of the Constitutional Court, 3199/2018. (VI. 21.) Order of the Constitutional Court, 3200/2018. (VI. 21.) Order of the Constitutional Court.], because “[t]he Constitutional Court considers the enforcement of European law [...] to be a particularly important reason”.

The Network of European Law Advisor Judges monitors the jurisprudence and the jurisdiction of the CJEU. The members of the network share the relevant information on the intranet of the court system. On the intranet site managed by the network, there are also practical information for judges how to request a preliminary ruling procedure.

Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

The Ministry of Justice co-ordinates the implementation of judgments of the European Court of Human Rights within the public administration of Hungary. First, just satisfaction awarded to the applicants is paid by the Ministry of Justice. As part of the implementation process, the Ministry of Justice has the judgment translated and publishes it on its website. Then the judgment is sent to the authorities responsible for the violation and competent to take measures for the prevention of similar violations in the future. Depending on the circumstances of the case, if reopening of the criminal proceedings is possible in accordance with the Code of Criminal Procedure, the judgment is also sent to the Prosecutor General.

Finally, the Ministry of Justice submits Action Reports to the Committee of Ministers of the Council of Europe and sends a yearly report about the judgments of the European Court of Human Rights to the Justice Committee of the Hungarian Parliament. The Committee adopts the report by majority votes.

Oversight, including by courts, of the use of intrusive surveillance software by national authorities

The Police does not use so-called “intrusive surveillance software”. The Police currently only use electronic methods to monitor coercive measures ordered by the courts, such as restraining orders and criminal supervision under the Code of Criminal Procedure, and compliance with the rules of conduct for preventive restraining orders under Act LXXII of 2009 *on restraining orders applicable due to violence among relatives*. IT software is currently being developed to monitor compliance with the rules of conduct specified in relation to preventive restraining orders.

Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

Act LIX of 2025 *on the registration of legal persons*, which will enter into force in January 2027, aims to establish the rules governing the registration, publicity and court registration procedures of legal persons by creating a modern legal framework and by making extensive use of the opportunities provided by electronic administration and developments in information technology. This Act extends a number of provisions that previously applied only to companies to civil organisations as well.

Within the framework of the Digital Citizenship Programme, new elements were introduced in the field of digital administration in 2024, such as the use of iFORM forms. The

introduction of iFORM forms ensures more transparent operation of civil organisations; therefore, in respect of certain types of procedures, proceedings may be conducted exclusively through the use of such electronic forms (for example, applications for the registration of an association, liquidation, and dissolution).

Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

As it was reported earlier, the National Cooperation Fund (Nemzeti Együttműködési Alap, hereinafter: NEA) is a funding framework and a form of public funding operated in partnership between NGOs and the Government through grant schemes targeting NGOs. The NEA is designed to support the operation and professional activities of NGOs; NGOs may apply not only for funding to cover their operating costs and to finance their professional programmes, but also for state aid related to the donations they collect.

Since 2015, the amount of the NEA funding framework has been linked to the amount of personal income tax 1% donations. The source of the NEA is equal to the difference between the amount that may be offered to NGO beneficiaries and the amount actually allocated to them in the second year preceding the fiscal year concerned. In order to ensure the independence of the funding system, 80% of NEA funding is allocated through grant applications, in accordance with the relevant legislation governing NGOs.

The total amount of the NEA funding framework for 2026 is HUF 16.04 billion, which exceeds the 2025 level by nearly 30% (HUF 13.02 billion). Compared to the launch of the Fund in 2012, the total amount of the NEA funding framework has increased almost fivefold (HUF 3.38 billion in 2012).

Other: comments and follow-up on the Hungarian chapter of the 2025 Rule of Law Report:

i) Regarding the following statement (on page on page 18): *“In February 2024, the State Audit Office had imposed fines on six opposition political parties for alleged illegal foreign funding during the 2022 election campaign<sup>127</sup>.”*

The six parties concerned initiated court proceedings in connection with the audit reports published in February 2024. In 2025, the court issued final judgments<sup>67</sup> in all six cases. In its judgments, the court analysed the SAO’s report in detail and confirmed that the SAO had acted lawfully in carrying out its audit within the scope of its remit, justified its findings on the basis of facts, and lawfully concluded that the parties of the opposition coalition had received illegal in-kind asset contributions during the 2022 parliamentary election campaign.

ii) Regarding the following statement (on page 22): *“In addition, many public interest trusts fail to comply with the Freedom of Information Act as they do not operate a website, their founding documents are not publicly available, and they do not publicly disclose data related to their activities.”*

In 2025, the SAO reviewed and assessed the transparency of public interest asset management foundations performing public tasks on the basis of their compliance with the

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<sup>67</sup> See details at: <https://www.asz.hu/en/budapest-capital-regional-court-the-state-audit-office-of-hungary-acted-lawfully-in-its-audit-of-campaign-financing>.

electronic disclosure obligation laid down in the Information Act. As part of its advisory activities, the SAO sent a letter to the foundations drawing their attention to the shortcomings identified in order to promote transparent operation. As a result of this call, 15 of the 34 foundations assessed published the data required by law on their own websites, while 19 foundations published it on the websites of the institutions they maintain or the business associations they have established. The SAO primarily examined the location and method of regular publication, as well as its structure, but in the future it will also check the adequacy and completeness of the published data.

In order to support the organisations concerned, in October 2024, the SAO prepared its financial and economic guidelines and recommendations for public interest asset management foundations performing public tasks in higher education and their higher education institutions<sup>68</sup>. This document is also a subchapter of the so-called Green Paper prepared in cooperation with the Ministry of Culture and Innovation. The Green Paper was presented by the SAO to the organisations concerned at a conference held jointly with the Ministry of Culture and Innovation on 21 May 2024.

One of the main objectives of publishing the above-referred financial and economic guidelines and recommendations was to provide substantive and efficient assistance to the audited organisations in preparing for audits by SAO and to contribute to improving the regularity and effectiveness of their financial management. The guidelines and recommendations address the most important aspects of the financial management and financing of foundations and the universities they maintain. They also discuss issues of asset management and asset registration, and cover the most important elements of exercising ownership rights in relation to business associations owned by maintainers or their institutions.

The guidelines also contain non-binding recommendations which, in addition to compliance with legal requirements, support not only regular but also efficient, effective and responsible financial management. The guidelines incorporate best practices, which are also non-binding, based on the regulations published on the websites of foundations and higher education institutions.

In order to promote voluntary compliance, the SAO publishes self-tests on its website,<sup>69</sup> which are continuously updated. Among other things, self-tests for political parties and party foundations that do not receive budgetary support, as well as for public interest asset management foundations and institutions, can be downloaded from the website of the SAO.

iii) Regarding the following statement (on page 26): *“Stakeholders have also expressed concerns about the impartiality of the State Audit Office, which has imposed severe fines on opposition parties because of campaign financing practices and not investigating similar practices of the governing parties.”*

We hereby reiterate the comments on the draft Hungarian chapter of the 2025 Report.

During its audit of campaign spending related to the 2022 parliamentary elections, the SAO assessed whether there was any suspicion of illegal party financing not only in the case of the six opposition parties participating in the opposition coalition, but also in the case of the governing parties. The SAO conducted the audit using the same methodology and tools and following the same principles for both the governing parties and the opposition parties.

<sup>68</sup> See the respective document at: [https://www.asz.hu/files/KEKVA\\_Penzugyi\\_Utmutato.pdf](https://www.asz.hu/files/KEKVA_Penzugyi_Utmutato.pdf)

<sup>69</sup> These are available at the following link: <https://www.asz.hu/ontesztekt>.

During its audit, the SAO found that not only opposition organisations but also organisations on the government side had carried out activities that could be considered campaigning. According to the SAO, this is not prohibited, as freedom of expression covers, even in the case of legal persons, activities that are likely to influence the will of voters. On the other hand, it is forbidden to support the campaigns of political parties in the form of financial or in-kind contributions, as this constitutes illegal campaign support. The SAO identified that the activities of the civil society organisation Mindenki Magyarországa Mozgalom (MMM), which is linked to the six-party opposition coalition, went beyond the freedom of expression. The MMM and the parties participating in the opposition cooperation coordinated their campaign activities and campaign spending by setting up a campaign council, as well as nominated a joint candidate for prime minister. The SAO found that during the campaign, MMM partially paid for the production of the joint posters, flyers and publications of the political parties from the support received from abroad, and partially covered the costs of the joint events. This support was accepted by the political parties participating in the cooperation, thereby breaking the rules on prohibited political party financing.<sup>70</sup>

The SAO conducted its audit using the same methodology in the case of civil society and non-profit organisations linked to the governing parties, but did not uncover any personal connections, coordinated campaign activities, common use of campaign tools or sharing of campaign costs in relation to the MMM and the six parties concerned.

### **Cross-pillar elements: cross-border rule of law issues related to the Single Market**

*If you are aware of any significant challenges concerning the Single Market faced by businesses or citizens from your Member State in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, please highlight them in the box below.*<sup>71</sup>

General remark: The Hungarian Government maintains and hereby reiterates its position sent to the Commission on 5 December 2024 within the framework of the Network of Contact Points on the Rule of Law concerning the Commission's decision to include and gradually further strengthen the Single Market dimension in its future Rule of Law Reports.

### **As regards the publication of your written input, please indicate whether you<sup>72</sup>:**

☒ **Consent**

☐ Do not consent

<sup>70</sup> Act LXXXVII of 2013 *on the transparency of campaign costs for the election of the Members of the National Assembly*, Sections 7(1)-(2), and Act XXXIII of 1989 *on the operation and financial management of political parties*, Sections 4(1)-(5)

<sup>71</sup> Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

<sup>72</sup> Should you wish to amend the input submitted ahead of the Report's publication, please simply indicate so to the Commission services which will ensure that the correct version is published.