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2025 Rule of Law Report Country Chapter on the rule of law situation in Hungary

Accompanying the document

**Communication from the Commission to the European Parliament, the Council, the
European Economic and Social Committee and the Committee of the Regions**

2025 Rule of Law Report The rule of law situation in the European Union

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ABSTRACT

In Hungary, the National Judicial Council has continued to exercise the powers acquired by means of the judicial reform of 2023. New rules have been introduced on the appointment and career of judges. In line with the legislation in force, the process did not always include the consultation of the National Judicial Council on some of the relevant legislative amendments. The transparency of case allocation in lower courts has not been improved, whereas the case allocation in the *Kúria* is being implemented well. The *Kúria* continues to enforce uniformity of case law through its uniformity complaint panel. Undue pressure on some judges continues within the judiciary, notably in relation to internal debates on key issues related to judicial independence. An increase in salaries in the justice system is being done in three steps until 2027. The efficiency of the judiciary and digitalisation of the justice system continues to be high overall.

The implementation of the 2024-2025 National Anti-Corruption Strategy and related Action Plan is ongoing, while important actions remain pending. The number of convictions for corruption crimes has decreased and there has been no progress to establish a robust track record on high-level corruption. Court decisions reviewing prosecutorial decisions not to investigate or prosecute corruption continue to be non-binding. There has been no progress yet to adopt new lobbying and post-employment rules, although there are plans to legislate in this area by November 2025. The Integrity Authority continues to report obstacles in fulfilling its oversight tasks effectively. Key shortcomings with regard to the transparency of the financing of political parties and electoral campaigns remain. Competition in public procurement has been improved, and different levels of control remain for national and EU-funds related procurements.

The threats to media pluralism highlighted in previous Rule of Law Reports have remained unaddressed. No measures have been adopted or are planned to regulate the channelling of state advertising to media outlets, to guarantee the functional independence of the media authority and to ensure the editorial and financial independence of public service media. Journalists continue to face numerous and serious challenges to their work. Journalists and media outlets have been investigated by the Sovereignty Protection Office for allegedly ‘serving foreign interests’, and access to public interest events and press conferences continues to be selectively denied. While the accelerated treatment of court cases related to access to information continues, the scope of access to information remains limited especially as regards public funding.

The Government continues to use its emergency powers extensively, undermining legal certainty and affecting the operation of businesses in the single market. The law-making process remains a serious source of concern, with certain important legislative processes not being linked to public consultation requirements. Foreign companies, including from other EU Member States, operating in strategic sectors face intensified regulatory pressure from state action. The possibility for the Government to interfere with the application of merger control rules continues to create legal uncertainty. Concerns related to the absence of procedural safeguards and effective oversight in case of secret surveillance measures outside criminal proceedings have not been addressed. A deteriorating environment for civil society organisations and legal uncertainty further obstruct civic space.

RECOMMENDATIONS

Overall, concerning the recommendations in the 2024 Rule of Law Report, Hungary has made:

- No progress on improving the transparency of case allocation systems in lower-instance courts, taking into account European standards on case allocation.
- Significant progress on increasing the remuneration of judges, prosecutors, and judicial and prosecutorial staff, without however taking structural measures, taking into account European standards on remuneration for the justice system.
- No progress yet on adopting comprehensive reforms on lobbying and revolving doors, and further improving the system of asset declarations, providing for effective oversight and enforcement.
- No progress on establishing a robust track record of investigations, prosecutions and final judgments for high-level corruption cases.
- No progressing on introducing mechanisms to enhance the functional independence of the media regulatory authority taking into account European standards on the independence of media regulators.
- No progress on adopting legislation to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies.
- No progress on strengthening the rules and mechanisms to enhance the independent governance and editorial independence of public service media taking into account European standards on public service media.
- No progress on removing obstacles affecting civil society organisations and foster a safe and enabling civic space, including by repealing legislation that hampers their capacity of working, in particular the immigration tax.

On this basis, and considering other developments that took place in the period of reference, in addition to recalling the obligation to comply with the rule of law-related rulings of the CJEU and the rule of law-related infringement procedures referred to in the country chapter, the Commission's assessment under the general regime of conditionality, the relevant concerns raised in the Article 7(1) TEU procedure initiated by the European Parliament, the relevant commitments made under the Recovery and Resilience Plan, and the relevant country-specific recommendations under the European Semester, it is recommended to Hungary to:

- Improve the transparency of case allocation systems in lower-instance courts, taking into account European standards on case allocation.
- Take measures to ensure that the ongoing increase in the remuneration of judges, prosecutors and judicial and prosecutorial staff is carried out in a structured manner, taking into account European standards on remuneration for the justice system.
- Put forward comprehensive legislative reforms on lobbying and revolving doors, and further improve the system of asset declarations, providing for effective oversight and enforcement.
- Establish a robust track record of investigations, prosecutions and final judgments for high-level corruption cases.
- Introduce mechanisms to enhance the functional independence of the media regulatory authority taking into account European standards on the independence of media regulators.

- Adopt measures to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies.
- Strengthen the rules and mechanisms to enhance the independent governance and editorial independence of public service media taking into account European standards on public service media.
- Ensure that there are no obstacles hindering the work of civil society organisations, including by repealing legislation that hampers their capacity of working, and foster a safe and enabling civic space.

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Hungary is low among the general public and companies. Overall, 37% of the general population and 38% of companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2025². The perceived level of independence among the general public has decreased in comparison with 2024 (41%), as well as in comparison with 2021 (41%). The perceived level of judicial independence among companies has slightly decreased since 2024 (40%) but remains higher than in 2021 (32%).

The National Judicial Council has continued to exercise the powers acquired by means of the judicial reform of 2023. In particular, the Council gave positive opinions on the suitability of candidates for the post of *Kúria* Vice-Presidents³ and considered the 2023 appointment by the *Kúria* President of four court managers in the *Kúria* in line with the law⁴. After the retirement of the head of the Civil Department and the appointment of the heads of the Criminal and Administrative Departments to the post of Vice-President, the *Kúria* President did not propose the appointment of new heads of department, as a Vice-President may also perform the duties of a head of department⁵. Also, the Council gave consent to the secondment of a judge to the National Directorate-General for Hospitals.

New rules have been introduced on the appointment and career of judges, but the process did not always include the consultation of the National Judicial Council on some of the relevant legislative amendments, in line with the legislation in force. On 22 November 2024, the Ministry of Justice signed an agreement with the National Judicial Council, the National Office for the Judiciary and the *Kúria* that includes salary increases for judges and court staff and announces some reforms to the judicial system⁶. As a follow-up to this four-party agreement, in December 2024, the National Assembly introduced several reforms. First, it passed legislation introducing the first step of a staggered salary raise in the justice system. Second, it adopted an amendment to the

¹ An overview of the institutional framework for all four pillars can be found [here](#). The assessments included in this country chapter do not prejudice any future assessment under Regulation (EU, Euratom) 2020/2092, Article 24 of Regulation (EU) 2021/241, or under Article 15 of Regulation (EU) 2021/1060.

² Figures 51 and 53, 2025 EU Justice Scoreboard and Figures 49 and 51, 2023 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ Decision 51/2024 of 27 March 2024.

⁴ Decision 151/2024 of 4 September 2024.

⁵ See Section 123(4) of Organisation and Administration of Courts Act. *Kúria* Vice-Presidents are appointed by the President of the Republic, upon the recommendation of the *Kúria* President. See also *Kúria* (2025a).

⁶ The topics listed in the agreement include: an increase of salaries of judges and court staff; the possibility for judges to serve until the age of 70; raising the minimum age requirement for becoming a judge; incentivising applications from outside the judiciary; centralised training for trainee judges, prosecutors, lawyers, notaries; the *Kúria*’s role in securing the uniformity of case law at all court instances; extending the territorial jurisdiction of district court judges to the entire area of jurisdiction of the regional court (that is the given county); the possibility of online presence during hearings; the possibility not to hand down reasoned judicial decisions in civil cases if it is presumed that the parties will not exercise their right of appeal; moving the registration of companies and CSOs from courts to the public administration.

Fundamental Law (Fourteenth Amendment) which raises the minimum age for becoming a judge and opens the possibility to continue serving as a judge after reaching the general retirement age. Third, it introduced new requirements in terms of prior experience needed to appoint judges from outside the judiciary. The reforms proposed by the Government attracted criticism and protests from judicial associations and judges on the grounds of judicial independence. Following these protests, the President of the National Judicial Council resigned on 3 December 2024. Although the National Judicial Council had discussed and signed the four-party agreement, it was not consulted on the subsequent legislative amendments. In fact, the Council considered that new provisions will have a negative impact on the working conditions of judges and on judicial training and will create unjustified differences of treatment within the judiciary. On 15 January 2025, the National Judicial Council withdrew from the four-party agreement, declaring it invalid. However, the Minister of Justice announced that the Government would still continue implementing the four-party agreement. On 11 June 2025, the National Assembly adopted a cardinal law setting in statute the detailed rules of some of the reforms mentioned in that agreement⁷. The new law introduced rules related to the functioning of the justice system, including detailed rules on the possibility for judges and prosecutors to serve until the age of 70, the *Kúria*'s role in securing the uniformity of case law, the possibility of online presence during hearings for members of the audience, the possibility not to hand down reasoned judicial decisions in civil cases if it is presumed that the parties will not exercise their right of appeal and the obligation of the courts to pay the parties a daily lump sum as compensation for any breach of a procedural deadline by the judge hearing the civil or administrative case. The National Judicial Council was consulted on the draft in a procedure described by the Council as ineffective⁸.

The Fourteenth Amendment to the Fundamental Law and other legislative amendments⁹ changed the rules on judicial appointments. They raised the lower age limit for becoming a judge from 30 to 35 years as of 1 March 2025 and introduced new requirements of prior experience outside the judiciary for first-time appointments to judicial posts¹⁰. According to the Government, these changes will increase the quality of the judicial system¹¹. The new appointment criteria are not applicable if the applicant for a judicial position is a junior judge who was employed in the judicial system before 1 January 2025, or a junior judge who was employed in the judicial system as a trainee judge before 1 January 2025. According to stakeholders, these changes favour candidates who apply from outside the judiciary¹². On 16 June 2025, the Venice Commission found that raising the minimum age for the appointment of judges from 30 to 35 years, although

⁷ Act XLIX of 2025.

⁸ See National Judicial Council (2025a) and National Judicial Council (2025b). The Council maintains that the time allowed for comments on the draft law was insufficient, its representatives were not invited to a consultation meeting held before the tabling of the draft law in Parliament and its comments were not taken on board. On 1 July 2025, the National Judicial Council challenged the new law before the Constitutional Court, maintaining a breach of its prerogatives.

⁹ Act LXXIV of 2024 and Act XLIX of 2025.

¹⁰ Under the new rules applicable from 1 March 2025, candidates must meet two conditions: (i) have gained 2 years' experience outside the judiciary (new requirement) and (ii) have worked at least 1 year as a junior judge, deputy prosecutor, lawyer, notary public, legal adviser, government official or civil servant, member of the Constitutional Court, judge, military judge, prosecutor, served as a judge at an international organisation or any EU institution or carried out any other justice-related activity (not a new requirement).

¹¹ Country visit, Ministries. The Venice Commission could not answer at this early stage whether these changes will serve, alone and in the abstract, to enhance public confidence in the judiciary and the quality of judicial decision-making. Venice Commission (2025), para. 49.

¹² Amnesty International Hungary et al (2025), p. 5; Hungarian Association of Judges (2025), p. 9.

rather high, is not per se contrary to international standards, and the requirement to have a fresh outside view into the court system may be welcomed. The new rules introduced – as of 1 January 2026 – the possibility for judges who have already reached the general retirement age to stay on the bench until the age of 70. If the judge concerned requests such extension in the timeframe determined by law, the President of the National Office for the Judiciary or – in the case of *Kúria* judges – the *Kúria* President must automatically grant the request¹³.

The transparency of case allocation in lower courts has not been improved, whereas the case allocation in the *Kúria* is being implemented well¹⁴. According to the Government, there is no need to revise the legislation applicable to case allocation in lower courts because the method of case allocation chosen by the court president has to ensure the objective and even distribution of cases; deviation from the pre-established rules is only allowed for reasons defined by law or because of important circumstances affecting the functioning of the court¹⁵. Several stakeholders note that the discretion allowed to court managers in lower courts, the existing exemptions to the case allocation rules and the frequent changes of these rules prevent the general public and the parties from verifying whether the rules are being followed¹⁶. Therefore, there has been no progress on the recommendation regarding case allocation in lower courts. As regards case allocation in the *Kúria*, following legislative reforms in 2023, the parties to the proceedings at the *Kúria* are able to verify on the basis of the case file whether the rules on case allocation have been duly applied¹⁷. No complaints were reported from parties in proceedings as regards case allocation at the *Kúria*¹⁸.

The *Kúria* continues to enforce uniformity of case law through its uniformity complaint panel. In 2024, the *Kúria* handed down 17 uniformity decisions and 40 uniformity complaint decisions (14 of them being on-the-merits decisions, including three having the effect of a uniformity decision)¹⁹. The *Kúria*'s uniformity decisions are binding on Hungarian courts until the uniformity complaint panel changes the decision. Preliminary references in the interest of uniformity of law and uniformity complaints are heard by the uniformity complaint panel composed of the *Kúria* President or Vice President and 40 senior judges (the Secretary General, heads and deputy heads of department and presiding judges)²⁰. The *Kúria* maintains that, following a decision handed down by the Court of Justice under Article 267 TFEU following a preliminary reference, *Kúria* judges and panels are required to seek the opinion of the uniformity complaint panel before setting aside (disapplying) a precedent decision of the *Kúria*,

¹³ Sections 25/B to 25/F of the Legal Status and Remuneration of Judges Act, as amended. This is in line with the recommendation of the Venice Commission.

¹⁴ The 2024 Rule of Law Report recommended that Hungary '[i]mprove the transparency of case allocation systems in lower-instance courts, taking into account European standards on case allocation'.

¹⁵ Hungarian Government (2025), written input, p. 4.

¹⁶ Amnesty International Hungary et al (2024), p. 11; CCBE (2025), p. 99; Hungarian Association of Judges (2025), p. 8; Hungarian Helsinki Committee (2025a); p. 12; MEDEL (2025), p. 7; Res Iudicata (2025), p. 8; Ügyvédkör (2025), p. 7.

¹⁷ 2023 Rule of Law Report, Hungary, p. 5; 2024 Rule of Law Report, Hungary, p. 6.

¹⁸ *Kúria* (2025c), p. 1.

¹⁹ In 2023, the *Kúria* delivered 9 uniformity decisions and 52 uniformity complaint decisions (21 of them being on-the-merits decisions, including 4 having the effect of a uniformity decision). See also 2024 Rule of Law Report, Hungary, p. 7.

²⁰ Section 41/A (1) of the Organisation and Administration of Courts Act. According to the case allocation scheme, the uniformity complaint panel has two subpanels, each composed of a chairperson and 20 members.

found incompatible with EU law²¹. This is necessary because the uniformity complaint panel has the exclusive competence to remove the binding force of legal interpretations contained in previously published *Kúria* decisions. In 2024, the Court of Justice already confirmed in a preliminary reference from a Hungarian court that any court must be able to disregard any binding ruling of a national court if it considers, in the light of the interpretation of EU law provided by the Court of Justice, that such ruling is not consistent with EU law²². A new law²³ adopted on 11 June 2025 further strengthens as of 1 January 2026 the *Kúria*'s role in enforcing the uniformity of case law when reviewing binding judicial decisions in civil cases.

Undue pressure on some judges continues within the judiciary, notably in relation to internal debates on key issues related to judicial independence. The *Kúria* President regularly questions in public the legitimacy of the service courts²⁴ and his criticism intensified after the presidents of the service courts and several other judges publicly criticised the four-party agreement²⁵. This prompted reactions from the National Judicial Council, the Res Iudicata Association and the Hungarian Association of Judges, which organised a demonstration in defence of judicial independence²⁶. On 17 March 2025, the Budapest Regional Court found that the *Kúria* President had unlawfully relieved a presiding judge from his duties as a sanction for expressing his criticism in relation to the *Kúria*²⁷. On 6 March 2025, in the context of the enhanced supervision of the implementation of the *Baka* judgment of the European Court of Human Rights, the Committee of Ministers of the Council of Europe invited the Hungarian authorities to consider adopting further general measures to address the 'chilling effect' present in the judiciary and to ensure that judges' freedom of expression, notably related to matters of public interest concerning the judiciary, is unambiguously guaranteed²⁸. Smear campaigns against judges continue to be reported²⁹.

²¹ Information received from the *Kúria* in the context of the country visit. According to the applicable legal rules as interpreted by the *Kúria*, lower-level courts may depart from *Kúria* decisions considered incompatible with EU law but must state the reasons for such departure.

²² CJEU judgment, *Global Ink Trade*. The Court of Justice held that the principle of the primacy of EU law does not preclude national legislation that merely requires lower national courts to state reasons for any departure from the rulings of higher courts (para 30).

²³ Act XLIX of 2025.

²⁴ Service courts ('*szolgálati bíróság*'), composed of members elected by the National Judicial Council from among judges, hear cases related to the assessment, fitness for office and disciplinary liability of judges.

²⁵ Service courts (2025). See also Verfassungsblog (2025).

²⁶ The International Association of Judges, the European Association of Judges, the Association of European Administrative Judges, the Association of Administrative Judges (Austria), the Association of Polish Administrative Judges and the Judges for Judges Association expressed their solidarity. The demonstration was organised on 22 February 2025. The ENCJ Executive Board welcomed and supported the fact that the National Judicial Council, the Hungarian Associations of Judges, and individual judges decided to speak out about the need for judicial independence and the threats faced by the Hungarian judiciary (ENCJ (2025)). See also *Kúria* (2025b) and *HVG.hu* (2025).

²⁷ Judgment 20.M.71.080/2024/13, confirmed by the Budapest Regional Appeal Court on 17 June 2025. See also Hungarian Helsinki Committee (2025d). According to the Government, the judge concerned retained his title and remuneration as presiding judge, continued to serve on the panel – including on the uniformity complaint panel where only presiding judges may sit – and could also preside over panels in specific cases.

²⁸ CM/Del/Dec(2025)1521/H46-15.

²⁹ Amnesty International Hungary et al (2025), p. 20; Hungarian Helsinki Committee (2025), p. 16. See *Magyar Nemzet* (2025), *Reuters* (2025), *Szabad Európa* (2025). European standards require that if commenting on judges' decisions, the executive and legislative powers avoid criticism that would

The Fourteenth Amendment to the Fundamental Law, adopted in December 2024, removes the requirement that the Prosecutor General be selected from among prosecutors. Following the entry into force of this constitutional amendment and related legislative changes, beside the mandatory three-year legal traineeship needed to pass the bar exam and the further requirement of having one year of professional experience, no further professional expertise will be required to be elected as the Prosecutor General. The Fifteenth Amendment to the Fundamental Law also fixes the retirement age of prosecutors at 70 as of 1 January 2026³⁰. As regards the appointment of the Prosecutor General, the Venice Commission considered that stricter criteria, coupled with adequate safeguards in the appointment process, could contribute to the de-politicisation of the position, and recommended to this end further amending the eligibility criteria for the position of Prosecutor General and considering the introduction of guarantees in the Prosecutor General's appointment process, such as the establishment of a Prosecutorial Council³¹. On 11 June 2025, the National Assembly elected a candidate from within the prosecution service to serve as new Prosecutor General, for a period of nine years. Hungary has not implemented GRECO's recommendation to review the possibility to keep the incumbent Prosecutor General in office after the expiry of their mandate by a parliamentary minority blocking the election of a successor. The hierarchical structure of the prosecution remains intact. This, together with the lack of internal checks and balances, means that the risk continues that senior prosecutors can influence the work of subordinate prosecutors, including in individual cases³². The Ministry of Justice can still access prosecutorial decisions relating to criminal procedures; according to stakeholders, this allows to exert political influence and pressure on the prosecution service in individual cases³³.

Quality

Significant progress has been made with the increase in salaries in the justice system, which is being done in three steps until 2027³⁴. Judicial salaries are calculated by applying various multiplying factors determined by law to the salary base³⁵. The salary base is determined by the National Assembly in the law on the annual central budget. The four-party agreement signed on 22 November 2024 envisages salary increases for judges and judicial staffs in three steps, which, as regards judges, would

undermine the independence of or public confidence in the judiciary (Council of Europe (2010), para. 18).

³⁰ See Sections 26/A to 26/C of the Legal Status of Prosecutors Act, introduced by Section 75 of Act XLIX of 2025. The office of Prosecutor General is excluded from the application of this age limit. A prosecutor who has reached the general retirement age may ask leave to remain in service until the age of 70. Contrary to the regime applicable to judges, the Prosecutor General has discretion to grant or deny such request.

³¹ Venice Commission (2025), paras. 29, 43-45.

³² 2024 Rule of Law Report, Hungary, p. 9.

³³ Amnesty International Hungary et al (2025), p. 19. See also, 2024 Rule of Law Report, Hungary, pp. 9-10.

³⁴ The 2024 Rule of Law Report recommended that Hungary '[t]ake structural measures to increase the remuneration of judges, prosecutors, and judicial and prosecutorial staff, taking into account European standards on remuneration for the justice system'.

³⁵ EU law requires in particular that the determination of the remuneration of judges by the legislature and the executive do not involve the exercise of an arbitrary power and is based on detailed rules which are objective, foreseeable, stable and transparent, and ensure that judges receive a level of remuneration commensurate with the importance of the functions they carry out, having regard to the economic, social and financial situation of the Member State concerned and the average salary in that Member State (CJEU judgment *Sąd Rejonowy w Białymstoku*).

lead to the average salary for these categories being increased by 48% by 2027. In December 2024, the National Assembly adopted the 2025 annual central budget raising the salary base for judges by 15%. The 2026 annual central budget, adopted in June 2025, raised the salary base for judges by further 10%. However, the measures do not introduce structural solutions, such as an automatic indexation of the salary base for judges, as is the case for salaries of a number of key public officials³⁶. Since January 2022, when the salary base was last adjusted, inflation has had an accumulated effect of 40%, and in February 2024 the National Judicial Council and the President of the National Office for the Judiciary had proposed a 35% increase. Some structural changes raised more substantially the salaries for judicial and prosecutorial staff at all instances and – based on a special agreement between the Minister of Justice and the *Kúria* President – for judges and court managers of the *Kúria*³⁷. Their salaries are ultimately also calculated based on the salary base for judges annually determined by Parliament. Therefore, there has been significant progress with the increase in salaries in the justice system.

Shortcomings exist in the legal aid scheme. The eligibility threshold for legal aid in civil procedure is high, meaning that a person with an income well below the poverty threshold may not be eligible for legal aid³⁸. At the same time, under the current legal framework, the status of ‘certified victim’ provides a more favourable treatment for the purposes of access to legal aid under the condition of social vulnerability. Even though the fees for defence lawyers under the legal aid scheme were raised as of 2024, they are still regarded as critically low, possibly impacting access to justice³⁹. As of 28 January 2025, at first instance, the court fee payable in small-value civil and commercial cases decreased, whilst in higher-value cases it increased, and the statutory fee cap has been removed. Hungary performs well as regards specific arrangements for child-friendly justice/proceedings (both civil and criminal/juvenile justice proceedings)⁴⁰. Also, as reported last year, access to justice could be improved through specific arrangements to persons at risk of discrimination and older persons.

Digitalisation of the justice system continues to be overall high. The courts have several digital tools at their disposal, including an electronic case management system, distance communication technology and secure electronic communication. Hungary is

³⁶ The salaries of several categories of key public officials – including members of Parliament, the President of the Republic, the Prime Minister and the top management of the Hungarian National Bank, the State Audit Office, the Competition Authority, the Public Procurement Authority, the National Atomic Energy Authority, the Hungarian Energy and Public Utility Regulatory Authority, the National Media and Infocommunications Authority, the Supervisory Authority for Regulatory Affairs, the Integrity Authority and the Sovereignty Protection Office – are calculated on the basis of the previous year’s gross average salary in the national economy, published by the Central Statistical Office.

³⁷ The remuneration for judges and court managers of the *Kúria*, as well as for prosecutors working at the Prosecutor General’s Office, is now fixed to the remuneration of the *Kúria* President. Also, the multipliers applicable to the calculation of the salaries of trainee judges and prosecutors, junior judges (*‘bíróági titkár’*), deputy prosecutors (*‘alügyész’*) and staff of forensic institutions have been increased by 0.15. Finally, the salaries of other judicial and prosecutorial staff are now calculated using a multiplier increased by 0.15.

³⁸ See Figure 23, 2025 EU Justice Scoreboard.

³⁹ Amnesty International Hungary et al (2025), p. 22; CCBE (2025), p. 102. See Figure 23, 2025 EU Justice Scoreboard. The fee amounts to EUR 17 (HUF 7 000) per hour; in addition, the legal aid lawyer is entitled to (i) the reimbursement of expenses, determined on the basis of an itemised statement or in the form of a 25% lump sum and (ii) a ‘preparation fee’ (see Section 4(2) of Decree 32/2017 (XII. 27) of the Minister of Justice).

⁴⁰ Figure 29, 2025 EU Justice Scoreboard.

among the best performing EU Member States as regards the availability of digital solutions to conduct and follow court proceedings in criminal cases⁴¹. Judgments are not yet assigned a European Case Law Identifier, and they are not yet modelled according to a standard which would enable their machine readability⁴². A legislative amendment introduced as of 1 January 2026 the online streaming of court hearings for pre-registered members of the audience in most civil and criminal cases⁴³.

Efficiency

The efficiency of the judiciary continues to be high overall. Hungary performed best among Member States as regards the estimated time needed to resolve litigious civil and commercial cases at all court instances in 2023⁴⁴. The number of pending civil, commercial and administrative and other cases in 2023 was the fourth lowest in the EU⁴⁵.

There is still no adequate compensation scheme for cases involving protracted criminal and non-contentious civil proceedings, while such a scheme has been introduced for contentious civil and administrative proceedings. In the context of the enhanced supervision of the implementation of the *Gazsó* judgment of the European Court of Human Rights, on 6 March 2025, the Committee of Ministers of the Council of Europe reiterated its ‘profound concern’ about the continued lack of any development as regards the outstanding issue of compensatory remedy in respect of excessively long criminal, administrative, and non-contentious civil proceedings, such as enforcement proceedings⁴⁶. On 11 June 2025, the National Assembly adopted a new law⁴⁷ amending the procedural rules applicable to contentious civil and – as of 1 July 2026 – administrative proceedings, obliging the court to pay the parties a daily lump sum as compensation for any breach of a procedural deadline by the judge hearing the case⁴⁸.

II. ANTI-CORRUPTION FRAMEWORK

The perception among experts, citizens and business executives is that the level of corruption in the public sector remains high. In the 2024 Corruption Perceptions Index by Transparency International, Hungary scores 41/100⁴⁹ and ranks 27th in the EU and 82nd globally. This perception has been relatively stable over the past five years⁵⁰. The 2025 Special Eurobarometer on Corruption shows that 88% of respondents consider corruption widespread in their country (EU average 69%) and 32% of respondents feel

⁴¹ Figure 46, 2025 EU Justice Scoreboard.

⁴² Figure 48, 2025 EU Justice Scoreboard.

⁴³ Sections 147 and 196 of Act XLIX of 2025 inserting Sections 232/A to 232/D in the Civil Procedure Code and Sections 438/A to 438/G in the Criminal Procedure Code, respectively.

⁴⁴ Figure 6, 2025 EU Justice Scoreboard.

⁴⁵ Figure 12, 2025 EU Justice Scoreboard.

⁴⁶ CM/Del/Dec(2025)1521/H46-17.

⁴⁷ Sections 142 to 144 and 170 to 171 of Act XLIX of 2025 amending the Civil Procedure Code and the Code of Administrative Court Procedure, respectively. The daily lump sum equals 1.5% of the monthly minimum wage (currently EUR 11 or HUF 4 362 per day).

⁴⁸ The National Judicial Council points to the risk of overlaps between the new compensation scheme and the already existing one applicable to civil proceedings, drawing attention to the impact it may have on court resources. National Judicial Council (2025a), National Judicial Council (2025b), pp. 9-12.

⁴⁹ The level of perceived corruption is categorised as follows: low (above 79); relatively low (between 79-60), relatively high (between 59-50), high (below 50).

⁵⁰ In 2020, the score was 44, while, in 2024, the score is 41. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points) and is relatively stable (changes from 1-3 points) in the last five years.

personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 83% of companies consider that corruption is widespread (EU average 63%) and 50% consider that corruption is a problem when doing business (EU average 35%). Furthermore, 34% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 36%), while 19% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 33%)⁵¹.

While implementation of some remedial measures in response to the EU conditionality procedure is ongoing, important shortcomings remain. To protect the EU budget against corruption and systemic rule of law issues, in 2022 the Council temporarily partially suspended funds under several EU programmes and prohibited entering into new legal commitments with public interest trusts, until the breaches of the principle of the rule of law and/or their effects or risks for the Union budget or the Union's financial interests were remedied⁵². On 2 December 2024, Hungary formally notified legislative amendments regarding certain public interest trusts and entities maintained by them and requested the Commission to propose to the Council to adapt or lift the measure on public interest trusts adopted in 2022⁵³. The Commission, having assessed the legislative amendments, considered that they do not adequately address the outstanding concerns on conflicts of interest in the boards of public interest trusts and therefore the measures related to public interest trusts should stay in place⁵⁴. Furthermore, no disbursement of funds under the Recovery and Resilience Plan can be made to Hungary until all the 'super milestones', including those related to the conditionality procedure, have been satisfactorily fulfilled.

The implementation of the 2024-2025 National Anti-Corruption Strategy and related Action Plan is ongoing, while important actions remain pending⁵⁵. The implementation of the Strategy and Action Plan, applicable as of 15 February 2024, is overseen by a monitoring committee and progress is tracked regularly⁵⁶. Certain measures have been taken, such as codes of conduct for low or mid-level officials, but important actions remain pending⁵⁷. These include measures on asset declarations, Codes of ethics for persons in top executive functions and members of Parliament, political party financing and the review of the motion for revision procedure⁵⁸. A final

⁵¹ Data from Special Eurobarometer 561 (2025) and Flash Eurobarometer 557 (2025).

⁵² Council Implementing Decision (EU) 2022/2506 of 15 December 2022.

⁵³ The written notification did not concern the partial suspension of funds under three EU programmes.

⁵⁴ Commission Decision C(2024) 9140 final of 16 December 2024. Hungary has challenged this Decision before the General Court; the case is pending (T-138/25).

⁵⁵ Government Decision 1025/2024. A separate Anti-Fraud and Anti-Corruption Strategy specifically for the protection of EU funds entered into force in 2022 and was revised in August 2024. See also the commitments under RRP milestones 178, 179, 220, 221. OECD has recommended enhancing coherence between the two anti-corruption strategies, OECD (2024b).

⁵⁶ The Monitoring Support Matrix is available on the Corruption Prevention website of the Hungarian Government and provides general information on actions taken, updated every three months. Hungarian Government (2025), written input, p.15.

⁵⁷ At least 60% of actions supposed to be implemented by 31 December 2024 have not been implemented within the indicated timeline. As noted also by the OECD and the Council of Europe, a comprehensive and strategic policy approach to effectively tackling corruption, including high-level corruption, remains missing from the strategy. Most integrity and corruption prevention measures target low and mid-level officials and the integrity framework applicable to persons with top executive functions remains weak.

⁵⁸ The possibility of 'motion for revision', which allows for the review of the decision by the prosecution service not to prosecute a case or the decision of the investigative authority not to investigate, was

implementation report is planned for 2026⁵⁹. Concerns previously raised by the OECD and the Council of Europe regarding the lack of a comprehensive and strategic policy approach to effectively tackling corruption remain in essence valid⁶⁰. The government informed that the evaluation of Hungary's policy approach to effectively tackling corruption is ongoing.

The Integrity Authority continues to report obstacles to fulfilling its oversight tasks effectively, and the practical impact of the proposals made by the Anti-Corruption Task Force has so far been limited. The Integrity Authority considers that it has adequate capacity and the necessary level of independence to carry out its work. Obstacles to the work of the Integrity Authority remain, particularly where it needs to rely on cooperation with other public bodies⁶¹. Whereas a government decree is expected to give the Integrity Authority a right of direct access to a number of state databases⁶², and the Government indicated that the current legal framework provides all necessary access rights, the Integrity Authority again reported obstacles related to access⁶³. The Integrity Authority referred nine cases to the prosecution service in 2024⁶⁴. As part of a criminal investigation against the President of the Integrity Authority, the police and prosecution service carried out an extensive raid of the Integrity Authority⁶⁵. The Government agreed or partially agreed with half of the recommendations made by the Integrity Authority in its second analytical integrity report, rejected about a third of them and is currently assessing the remaining recommendations⁶⁶. In general, however, the concrete follow-up given to accepted recommendations remains unclear⁶⁷. In May 2025, the non-governmental members of Anti-Corruption Task Force (ACTF) rejected its draft annual report⁶⁸. The ACTF launched an evaluation process to avoid similar situations in the future. More broadly, non-governmental members of the Task Force remain

introduced in the Criminal Procedure Code by Act XLIV of 2022 to address the concerns raised in the past as regards the accountability of the prosecution service.

⁵⁹ See RRP milestone 179.

⁶⁰ 2024 Rule of Law Report, Hungary, p. 14.

⁶¹ Country visit Hungary, Integrity Authority. To enhance cooperation with other public bodies, the Integrity Authority proposed to amend and mirror also in sectoral laws the powers it has under the Act XXVII of 2022 establishing the Integrity Authority.

⁶² Country visit Hungary, Government. Government Decree 322/2024 of 6 November 2024.

⁶³ The Authority reported not having access to banking, tax and insurance records which is key for investigations. This includes the central register on beneficial ownership managed by the Tax and Customs Administration. Obstacles related to access to data, are also reported in the Integrity Authority's 2024 annual report to the Hungarian Parliament. See Integrity Authority (2025).

⁶⁴ Country visit Hungary, Integrity Authority. OLAF and the EPPO were also notified.

⁶⁵ Country visit Hungary, Integrity Authority. The President of the State Audit Office has the power by law to initiate administrative court proceedings to dismiss the President of the Integrity Authority. Stakeholders consider that this is a disproportionate response considering the alleged irregularities, and that it risks undermining the independent and effective functioning of the Integrity Authority. Amnesty International Hungary et al (2024), p. 53.

⁶⁶ Integrity Authority (2025). The Integrity Authority addressed 74 recommendations to the Government on the audit system for EU funds, the effectiveness of public procurement rules, the analysis of public procurement data and the asset declaration system. The Government's position on the findings presented in the Integrity Authority's 2023 Annual Analytical Integrity Report is available on its webpage. The Government is not required to agree with all of the recommendations, but it must reply to the report and explain how it will address the findings.

⁶⁷ The replies of the Government lack clear implementation proposals and timeline. Integrity Authority (2023a).

⁶⁸ In particular, they considered that it did not correctly reflect the gravity of the corruption situation in Hungary and that their suggestions to the report were dismissed without substantive review. Non-governmental members will publish their own shadow report. *Átlátszó* (2025). Anti-Corruption Task Force Meeting (2025).

concerned as regards its impact, capacities, powers and the Government's limited uptake of proposals⁶⁹. Two of the organisations that are members of the ACTF have been subject to an investigation by the Sovereignty Protection Office⁷⁰.

The number of submitted motions for revision of prosecutorial decisions doubled in 2024 and nearly a third resulted in the continuation of investigations. Since January 2023, it is possible for a judge to review prosecutorial authorities' decisions not to investigate corruption suspicions or to terminate ongoing corruption investigations without indictment⁷¹. In 2024, 80 motions for such a revision were submitted to the Buda Central District Court (compared to 38 in 2023)⁷². Whereas nearly a third of all motions resulted in the continuation of investigations⁷³, a majority of the motions submitted by the Integrity Authority have resulted in a resumption of investigations⁷⁴. Motions for revision have proven a useful tool for the Integrity Authority, however it considers that its powers remain limited as regards access to criminal proceedings and the ability to present evidence in that context⁷⁵. Shortcomings of the new procedure concern the temporal scope of the new measure and the lack of binding authority for court decisions quashing prosecutorial decisions⁷⁶. The review by the Ministry of Justice of the functioning and effectiveness of the provisions on judicial review is ongoing with a view to proposing amendments⁷⁷. According to stakeholders, restricted access to case files and stringent procedural deadlines negate the possibility to use the procedure for private prosecution⁷⁸.

Integrity tests and lifestyle checks remain key tools to detect and deter corruption in the administration, although their effectiveness in detecting high-level corruption is limited. According to the prosecution, detection remains the main challenge in the investigation and prosecution of corruption offences⁷⁹. Information and evidence of corruption crimes are primarily obtained in ongoing criminal investigations and prosecutions. Reports transmitted to prosecution by the National Protective Service, which is tasked with carrying out integrity tests and lifestyle monitoring for staff subordinated to the Ministry of Interior and other public administrative bodies, generally

⁶⁹ Country visit Hungary, CSOs. See also K-Monitor and Transparency International Hungary (2024).

⁷⁰ The ACTF reportedly operates in an environment of distrust between the government and CSOs. See Sovereignty Protection Office (2024). The Office states that foreign-funded political pressure groups exploited the Anti-Corruption Task Force to pressurise Hungary. See also *Átlátszó* (2024).

⁷¹ 2024 Rule of Law Report, Hungary, p. 16.

⁷² Amnesty International Hungary et al (2025), p. 51, referring to a response by the Buda Central District Court (2024.El.IV.H.17/4).

⁷³ As reported by the Government, between 1 January 2023 and 31 December 2024, of the 185 motions submitted in separate proceedings, 54 were successful. In 2023, the court granted the motion for judicial review in only five cases, while in 2024 it was granted in four cases. Most recently, after an initial refusal by the police, a logistics deal between the state-owned Magyar Posta and the Waberer's Group will be investigated following a successful motion by the NGO K-Monitor. This is the first CSO to successfully use the motion for revision. See K-monitor (2025).

⁷⁴ Integrity Authority (2025a).

⁷⁵ In 2024 the Integrity Authority submitted a motion for revision in 12 cases. The prosecution service and the court admitted the motion for revision in every case.

⁷⁶ Council Implementing Decision (EU) 2022/2506 of 15 December 2022, recital 46.

⁷⁷ Action 3.9 of the Action Plan to the National Anti-Corruption Strategy, with a deadline of 15 May 2024.

⁷⁸ Amnesty International Hungary et al (2024). See also K-Monitor (2023).

⁷⁹ Country visit Hungary, prosecution service.

concern more petty crimes of public officials⁸⁰. There is no publicly available data on the reliability tests or national security vettings conducted by the Constitution Protection Office, which is responsible for carrying out checks as regards high-ranking officials, given the confidentiality of its activities⁸¹. However, the prosecution service indicates receiving few reports related to suspicions of corruption from the Constitution Protection Office⁸². Other tools that could be more effective in detecting a wider variety of corruption cases, such as asset declarations, whistleblower reports and data from various registers, such as the central register for beneficial ownership information managed by the Tax and Customs Administration, play a relatively minor role in corruption investigations⁸³.

The number of convictions for corruption crimes has decreased and there has been no progress to establish a robust track record on high-level corruption⁸⁴. Whereas the prosecution service reports that sufficient human and financial resources, with an adequate level of specialisation are allocated to corruption cases, it also highlights the high rate of vacancies among junior prosecutors and the need for further specialisation⁸⁵. The new IT system for the handling of case files by the prosecution service is planned to be operational by the end of 2025⁸⁶. The reported indictment rate for corruption crimes continues to be high⁸⁷. In 2024, 264 persons were convicted at final instance for corruption crimes, which is a decrease compared to the previous year⁸⁸. Since 2023, criminal proceedings have been ongoing in a corruption and money laundering case against a number of defendants involving a former high-level official⁸⁹. While four defendants have been sentenced to prison in a corruption case involving primarily EU

⁸⁰ In 2024, integrity checks were conducted on 835 individuals, resulting in nine persons reported for breach of duty for undue advantage. The 17 271 lifestyle checks undertaken resulted in findings that 149 people did not meet the ethical standards.

⁸¹ Since the Constitution Protection Office is a national security service, the detection of potential corruption by this Office falls under national security rules and remains undisclosed. The legality and compliance with the law of the investigations carried out, including the question of a possible criminal prosecution, is overseen by the designated prosecution service. No data on detected corruption cases is available. See also 2023 Rule of Law Report, Hungary, p. 14.

⁸² Country visit Hungary, prosecution service.

⁸³ Country visit Hungary, prosecution service.

⁸⁴ The 2024 Rule of Law Report recommended to Hungary to '[e]stablish a robust track record of investigations, prosecutions, and final judgments for high-level corruption cases'.

⁸⁵ Country visit Hungary, prosecution service.

⁸⁶ Financial data relevant for investigations is spread over numerous separate state registers. The new IT system for the handling of sensitive documents was originally planned to be supported under the RRP and fully functional and operational by Q2 2024, see 2023 Rule of Law Report, Hungary, p. 16, and RRP milestone 180. In addition, a new case management IT system facilitating administrative work, and the exchange of non-sensitive information is also planned under the RRP to be fully functional and operational by the end of 2025, see RRP milestone 181.

⁸⁷ A total of 164 investigations for corruption crimes were completed, with 120 procedures resulting with an indictment. Hungarian Government (2025), written input, Annex, pp. 1-2.

⁸⁸ Hungarian Government (2025), written input, p. 24. In 2023, there were 364 final convictions. In November 2024, four defendants out of 54 were sentenced to prison at first instance in a corruption case involving primarily EU funds (Prosecution service (2024)). In another case, the court-imposed prison sentences on three people, and another defendant was sentenced to a suspended prison sentence in a bribery case related to land tenders (Budapest Regional Court (2025)).

⁸⁹ Allegations of evidence-tampering by the prosecution service upon Government instructions and the obstruction of justice by the Government in this high-level corruption case involving a former state secretary of the Ministry of Justice and the chief bailiff prompted the prosecution service to initiate investigations for failure to report bribery. See Reuters (2024) and Telex (2024).

funds⁹⁰, convictions in high-level corruption cases continue to be rare⁹¹. Generally, in complex high-level corruption cases, court proceedings tend to be long⁹². The risk of political influence and undue interference with individual cases in the prosecution service and the police, the absence of investigations of corruption allegations concerning high-level officials and their immediate circle, as well as clientelism, favouritism and nepotism in high-level public administration remain areas of concern⁹³. The lack of enforcement against foreign bribery is a persistent concern, with no new investigations or convictions and long-standing international recommendations remaining unaddressed⁹⁴. Overall, no progress was made on establishing a robust track record to fight high-level corruption, as recommended in the previous years.

There has been no progress yet on the recommendation regarding lobbying and post-employment regulation, although there are plans to legislate in this area by November 2025⁹⁵. The Government plans to adopt legislation on lobbying, including rules on revolving doors, by 30 November 2025. Its exact elements are yet to be decided⁹⁶. Pending its adoption, no steps have been taken to establish rules on contacts between members of Parliament and lobbyists⁹⁷. Preparations are still ongoing for a non-binding code of conduct for members of Parliament, including guidelines on lobbying and post-employment⁹⁸. No steps have been taken to prepare the code of conduct for persons in top executive functions, planned by 30 April 2024⁹⁹. Hungary's legislative framework on lobbying and post-employment rules remains incomplete, with no systematic follow-up ensured in case of non-compliance¹⁰⁰. Since no steps have been taken for a comprehensive reform on lobbying and post-employment rules, there has been no progress yet on the recommendation.

There has been no progress to improve the asset declaration system, including to ensure effective oversight¹⁰¹. Actions to strengthen the asset declaration system foreseen in the 2024-2025 National Anti-Corruption Strategy are pending¹⁰². The power to verify

⁹⁰ The case involves 54 defendants and concerns a vast corruption network manipulating public tenders. Officials from multiple ministries were implicated, including the Finance Ministry and the Prime Minister's Office. Prosecutor's Office (2024).

⁹¹ Country visit, Transparency International Hungary and K-monitor. See also Council of Europe (2023) and Amnesty International Hungary et al (2025), p. 50.

⁹² Transparency International Hungary and K-Monitor (2024). In one case involving a former Member of Parliament indicted in 2019, the court case has restarted from the first hearing for the fourth time in 2024. Amnesty International Hungary et al (2025), p. 51.

⁹³ See 2024 Rule of Law report, Hungary, p. 19. See also GRECO (2022), p. 6, paras. 31-35; GRECO (2023b), p. 29, para. 126, pointing at hierarchical pressure on police officers to discontinue investigations in certain sensitive cases.

⁹⁴ OECD (2023). See also OECD (2024).

⁹⁵ The 2024 Rule of Law Report recommended to Hungary to '[a]dopt comprehensive reforms on lobbying and revolving doors [...] providing for effective oversight and enforcement'.

⁹⁶ Country visit, Hungarian Government.

⁹⁷ See GRECO (2022), paras. 9-10.

⁹⁸ Country visit Hungary, National Assembly.

⁹⁹ Action 2.1 of the Action Plan. The monitoring table indicates that the Ministry of Justice held consultations during which it has been established that Government Decree 477/2024 of 31 December 2024 on the procedure to be followed in relation to protocol gifts is sufficient for the fulfilment of Action 2.1.

¹⁰⁰ 2023 Rule of Law Report, Hungary, pp. 18-20. See also GRECO (2023a), p. 56.

¹⁰¹ The 2024 Rule of Law Report recommended to Hungary to 'further improve the system of asset declarations, providing for effective oversight and enforcement'.

¹⁰² The Action Plan mandates the Ministry of Justice to create the possibility to submit asset declarations electronically, to consider extending the personal scope and to introduce an effective, proportionate, and dissuasive administrative and criminal sanctions' regime by April 2024.

asset declarations has not yet been effectively transferred to the Integrity Authority¹⁰³. The Government did not provide an official reply to the Integrity Authority's special report on the asset declaration system¹⁰⁴. Publicity requirements do not apply to most persons entrusted with senior political functions and information about follow-up is not public either. Stakeholders highlight the narrow scope of the declarations, which provide for opportunities to potentially hide assets¹⁰⁵. A recent amendment to the anti-money laundering legislation, aiming to increase transparency of ultimate beneficial owners of previously established private equity funds, will not enter into force until July 2026¹⁰⁶. Concerns persist regarding the effective and regular monitoring and verification asset declarations of members of Parliament¹⁰⁷. In 2024, no procedure against a member of Parliament was initiated, and six members of Parliament rectified their asset declarations after errors were revealed by the public¹⁰⁸. A recent amendment introduced minor changes to the procedure for declaring assets, without modifying the substantive rules¹⁰⁹. In 2025, the National Assembly adopted new rules for Hungarian members of the European Parliament which foresee that non-compliance with asset declaration obligations could lead to the termination of their mandate by the Electoral Commission¹¹⁰. Against this background, no progress has therefore been made towards implementing the recommendation made in the 2024 Rule of Law Report¹¹¹.

Guides and awareness-raising measures on conflicts of interests are implemented in certain sectors, but legislative fragmentation and systemic weaknesses remain. Based on the Action Plan of the National Anti-Corruption Strategy 2024-2025, the Government plans to regulate conflicts of interest in the upcoming codes of conduct for

¹⁰³ 2024 Rule of Law Report, Hungary, p. 22.

¹⁰⁴ Integrity Authority (2023b). In the context of the case report on asset declarations, the Authority has submitted to the Ministry of Justice concrete proposals for amendments to the law. The recommendations include the creation of a dedicated electronic platform for submission of asset declarations, introduction of an adequate sanctions regime, streamlining the verification process and automatic comparison of asset declarations with external databases. See the Government's position on the findings presented in the Integrity Authority's 2023 Annual Analytical Integrity Report.

¹⁰⁵ Country visit Hungary, CSOs and the Integrity Authority. 2024 Rule of Law Report, Hungary, p. 22. Private equity funds, fiduciary asset management arrangements and non-taxable revenues are not included in the declarations, which means they are not subject to general oversight and access by the Integrity Authority. Moreover, the registration of beneficial ownership information for private equity funds is not required by law. An infringement procedure (INFR(2023)2098) against Hungary was launched in July 2024 for non-compliance with the 5th Anti-Money Laundering Directive.

¹⁰⁶ The Commission sent another letter of formal notice to Hungary in this regard on 7 May 2025.

¹⁰⁷ There is no obligation to regularly monitor, check the correctness or the completeness of the declarations. Verification of asset declarations is only triggered by notification of suspicions. Any possible follow-up is at the discretion of the public official's employer or, in case of members of Parliament and other high-ranking officials, of the Immunity Committee. GRECO also found that the verification of declarations was clearly insufficient (GRECO (2023), p. 4, para. 3). Members of Parliament continued largely to submit their asset declarations on paper. In 2025, 63 used electronic submission, while 134 completed the declaration on paper. Country visit Hungary, National Assembly.

¹⁰⁸ Country visit Hungary, National Assembly.

¹⁰⁹ Act LXXV of 2024 applies to declarations of assets and conflict of interest and introduces time limits for all procedural acts. The substantive examination remains with the Committee on Immunity.

¹¹⁰ Act XX of 2025. Asset declarations to be submitted by MEPs are identical in format and detail to those required of national members of Parliament.

¹¹¹ Important weaknesses, risks and shortcomings remain as regards elements of the asset declaration system which create possible loopholes undermining the effectiveness of the measure were also identified by the Communication on the application of Regulation (EU, Euratom) 2020/2092 (15 January 2024). Council Implementing Decision (EU) 2022/2506 of 15 December 2022, recital 41.

persons in top executive functions and members of Parliament¹¹². A new code of ethics and conduct for parliamentary civil servants was adopted in October 2024 but is not publicly available¹¹³. Changes were made to the ethics framework for local and law enforcement authorities, covering also conflicts of interest¹¹⁴. In 2024, the National Assembly terminated the mandate of one of its members due to a conflict of interest¹¹⁵. However, there were no developments to address the systemic weaknesses reported in 2023 and 2024. These include the fragmentation of the regulatory framework on conflict of interests, including as regards public interest trusts, the lack of a general definition of conflicts of interest and the absence of a central supervisory body¹¹⁶. A recent audit of the Hungarian National Bank, its own trusts and a related public interest trust maintaining a university led the State Audit Office to file a criminal report against the public interest trust concerned due to conflicts of interest¹¹⁷.

The framework for the protection of whistleblowers is in place, however whistleblowing plays a limited role in the detection of corruption crimes. The Office of the Commissioner for Fundamental Rights provides training to civil servants and the preparation of an information campaign on the functioning of whistleblowing platforms and whistleblower protection regimes is still ongoing¹¹⁸. According to stakeholders and as illustrated by survey data, whistleblowing is still not a sufficiently widespread practice¹¹⁹. Reports can be submitted on the whistleblowing channel for reports on EU fraud, to the Integrity Authority, as well as to the Public Procurement Authority, the National Development Centre and the Competition Authority¹²⁰. However, the prosecution service reports that whistleblower reports do not play a role in the detection of corruption crimes¹²¹. Civil society organisations continue to raise concerns regarding

¹¹² Hungarian Government (2025), written input, p. 11. This will be part of the upcoming codes of conduct.

¹¹³ Country visit, National Assembly. It contains guidance for the proper management of conflicts of interest.

¹¹⁴ Hungarian Government (2025), written input, pp. 16-17. This includes a draft methodological guide for local authorities and revised code of ethics and rules of ethical procedure for law enforcement officials.

¹¹⁵ Country visit Hungary, National Assembly.

¹¹⁶ 2023 Rule of Law Report, Hungary, pp. 21-23.

¹¹⁷ State Audit Office (2025). The State Audit Office found that nearly EUR 1.3 billion were affected by opaque and overpriced real estate and art acquisitions, complex and risky investment structures, and significant financial benefits directed towards companies linked to the son of the National Bank's then governor. It also found that the decision of the public interest trust to invest in bonds issued by the fund manager of the National Bank's own trusts violated the conflict of interest provision of the deed of foundation.

¹¹⁸ Information concerning guidance on the functioning of the protected electronic submission system, the complaint process, whistleblower protections, and the availability of state support measures is available on the website of the Office. Hungarian Government, written input, p. 18. See Actions 4.3, 4.4 and 4.5 of the Action Plan to the National Anti-Corruption Strategy.

¹¹⁹ See also the Special Eurobarometer 584 on Corruption (2024) on the level of corruption reporting. See also Hungarian Helsinki Committee (2025c).

¹²⁰ The anti-lop.hu whistleblowing channel for reports on EU fraud received only 19 reports between July 2024 and March 2025, with investigations ongoing in 11 cases. The Integrity Authority received 172 reports in 2024, of which 90 fell in its remit. In 48 cases the information did not give rise to the opening of an investigation. Country visit Hungary, Integrity Authority.

¹²¹ Country visit Hungary, prosecution service.

differences in protection levels for whistleblowers who report breaches of national rules which do not fall within the national legislation transposing Directive 2019/1937¹²².

Key shortcomings with regard to the transparency of the financing of political parties and electoral campaigns remain. No steps were taken in the reporting period to address long-standing recommendations to strengthen the transparency of political party and campaign financing¹²³. While some measures have previously been taken to ensure that political party financial registries are transparent and up-to-date, deficiencies remain regarding the transparency and supervision of the accounts of foundations or third-party entities directly or indirectly related to or under the control of political parties¹²⁴. Furthermore, the applicable legislation does not require the disclosure of campaign donations, nor does it prohibit the use of state resources for campaigning during a pre-election period¹²⁵. The possibility for circumvention of campaign spending limits via the use of third-parties and intermediaries, as reported during the 2022 elections¹²⁶, also remains unaddressed. In February 2024, the State Audit Office had imposed fines on six opposition political parties for alleged illegal foreign funding during the 2022 election campaign¹²⁷. On 17 June 2025, in expedited procedure, the National Assembly passed a law that removes the cap on political campaign expenses¹²⁸.

Competition in public procurement has been improved, and different levels of control remain for national and EU-funds related procurements. Corruption risk sectors remain largely the same compared to previous years, with high risks in public procurement, construction, health, IT, and communication services¹²⁹. Corruption prevention carried out by the National Protective Service reportedly continues to play a major role in reducing corruption pressure on the health sector¹³⁰. Businesses' attitudes towards corruption in the EU show that 36% of companies in Hungary (EU average 25%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years¹³¹. Only 28% of businesses perceive the level of independence of the public procurement review body (Public

¹²² See also 2024 Rule of Law Report, Hungary, p. 24. Hungarian legislation includes specific safeguards for certain whistleblowing categories. Section 174 of the Criminal Procedure Code and Section 155 of the Media Act provide legal protections for media informants.

¹²³ See OSCE ODIHR and Venice Commission (2020), para. 194. As reported last year, the National Anti-corruption Strategy mandates the Government to examine the enforcement of political party finance rules and the operational practices of political organisations, with an exclusive focus on preventing foreign influence.

¹²⁴ See GRECO (2019).

¹²⁵ See OSCE ODIHR (2022), p. 22. State Audit Office audit findings cannot be challenged before an administrative court.

¹²⁶ As regards political advertising on the social media platform Facebook, financed by third parties and intermediaries, including the social media incubator Megafon Centre training pro-government influencers and promoting their posts as one of the largest spenders on political ads on Facebook in the election campaign, see 2023 Rule of Law Report, Hungary, pp. 24-25; on the level of spending, see *Lakmusz* (2024); and *Telex* (2024).

¹²⁷ See 2024 Rule of Law Report, Hungary, p. 24.

¹²⁸ Act LXVIII of 2025. The Committee of Ministers of the Council of Europe has recommended to states to prevent excessive funding needs of political parties, such as establishing limits on expenditure on electoral campaigns. Council of Europe Committee of Ministers (2003).

¹²⁹ Hungarian Government (2025), written input, pp. 22-23; Amnesty International et al (2025), pp. 47-48; Corruption Research Center Budapest (2024).

¹³⁰ Hungarian Government (2025), written input, p. 19.

¹³¹ Flash Eurobarometer 557 on Businesses' attitudes towards corruption in the EU (2025). This is 11 percentage points above the EU average.

Procurement Arbitration Board) as very or fairly good¹³². The competition in public procurement procedures is improving and the Single Market and Competitiveness Scoreboard on access to public procurement in Hungary reports 32% of single bids for 2023 (EU average 29%) and 23% for 2024¹³³. While the share of public procurement procedures with single bids decreased for both EU-financed and national procurements, the target committed to by Hungary for domestically financed public procurements was not met in 2023 (29% vs the target of 24%) and 2024 (22.3% vs the target of 15%)¹³⁴. Some studies point to an increase in corruption risks for such procurements where different levels of control and oversight apply¹³⁵. In addition, focussing solely on the share of single bids can hide the root causes of lack of competition¹³⁶. The Government's action plan to improve competition in public procurement contains several measures aiming to foster competition¹³⁷. According to stakeholders, the action plan lacks ambition and does not sufficiently reflect relevant recommendations of the Integrity Authority¹³⁸. Stakeholders report increased corruption risks due to an excessive use of concession contracts and an report that many framework agreements were concluded with a single bidder¹³⁹. Framework agreements concluded by central purchasing bodies have allowed certain economic operators to become market leaders or to acquire a dominant position at the expense of their competitors¹⁴⁰. Concerns remain regarding favouritism in tender processes and selective awarding to political affiliates, which increase corruption risks¹⁴¹.

¹³² Figure 59, 2025 EU Justice Scoreboard.

¹³³ SWD(2025) 217 final. The 2024 data on single bids is provisional and subject to revision.

¹³⁴ Based on data from Public Procurement Data Space the share of single-bid procedures within nationally financed public procurement showed a significant decrease of 6.7 percentage points in 2024 compared to the previous year.

¹³⁵ Corruption Research Center Budapest (2023). On government communications contracts, see *Szabad Európa* (2024). Regarding EU-related procurement, see Integrity Authority (2024a) and (2023c), with recommendations for the Government. Hungary has committed to reduce to 15% the high share of calls for tenders that result in a single bid under the RRP, while the share of single bids is reportedly significantly higher for high-value, non-EU fund-related public procurements.

¹³⁶ These include supporting bids, collusion or a high ratio of invalid tenders. Integrity Authority (2023d).

¹³⁷ According to the government, these measures are based on the analysis carried out in the framework of the Public Procurement Performance Measurement Framework, reflect international best practices or address recommendations of the Integrity Authority and the Anti-Corruption Task Force.

¹³⁸ Amnesty International Hungary et al (2025). For most of the recommendations of the Integrity Authority, the government did not see a need to take any action and/or did not commit to any action.

¹³⁹ Stakeholders report extreme market concentration in sectors such as communications and IT and excessively long concession contracts, such as the 35-year concessions of waste management and motorway. The share of framework agreements with a single bidder has been rising steadily since 2019, reaching around 70% in 2023 and 2024 (Integrity Authority (2024c), p. 54)). While Government Decree 63/2022 of 28 February 2022 increased the effectiveness of some of these provisions subsequently Government Decree 53/2024 of 4 March 2024 exempted a number of procedures from their application. According to the Government, the use of concession contracts and framework agreements is in line with similar practices in other Member States.

¹⁴⁰ In April 2024, the Commission opened an infringement procedure against Hungary (INFR(2024)4006) for awarding the 35-year motorway concession contract in breach of EU rules on concessions.

¹⁴⁰ 2024 Rule of Law Report, Hungary, p. 4.

¹⁴¹ 2024 Rule of Law Report, Hungary, p. 4. On 18 June 2025, the Commission opened an infringement procedure against Hungary (INFR(2025)2051) for failing to award a high-value exploitation contract for sand and gravel mining sites in an open and transparent tender procedure.

III. MEDIA PLURALISM AND MEDIA FREEDOM

There has been no progress to strengthen the functional independence of the Hungarian media regulator¹⁴². While the Media Act provides for formal independence of the National Media and Infocommunications Authority (NMHH), government influence remains significant due to the composition of the decision-making body of the Authority, the Media Council, which remains composed of members all nominated by Parliament. The Council has undertaken investigations into private media considered to be pro-government for potentially racist and anti-immigrant content and into public service media for airing disguised political advertising during the election period. Nevertheless, in the light of the unresolved concerns with regard to the authority, the 2025 Media Pluralism Monitor (MPM) once more assesses the independence and effectiveness of the Media Authority as an area presenting high risk, referring to the authority's composition, lack of transparency of its decision-making process and certain 'politically motivated' decisions¹⁴³. Given that no measures have been adopted or are planned to strengthen the regulator's functional independence, there has been no progress as regards the recommendations made in previous years.

There has been no progress to increase transparency and fairness in the distribution of state advertising¹⁴⁴. The general rules and procedures regulating public procurement govern these expenditures and no specific rules ensuring transparency and fairness regulating distribution exist. Public sector communications are carried out under one framework contract with the National Communications Office (NKOH)¹⁴⁵. The State remains, by far, the most important player in the media advertising market channeling significant state resources to pro-government media and increasing its spending¹⁴⁶. State advertising accounts for over 30% of the total advertising market, while the Central European Press and Media Foundation (KESMA), a conglomeration of pro-government media outlets, receives up to 75-80% of its total revenue from state advertising¹⁴⁷. The 2025 MPM points out that 'it is still the case that the state advertises almost exclusively in pro-government media outlets and that the majority of advertising revenues for several media products, typically pro-government, are generated by state advertising' concluding that this remains an area presenting medium-high risk¹⁴⁸. Given that no legislative or other measures have been adopted or are planned by the Government on the fair distribution of state advertising, there has been no progress as regards the recommendations made in previous years.

Transparency in the ownership structure of media companies is not regulated by any specific provisions. Section 41 of the Media Act mandates the NMHH to maintain registers on media service providers, but these registers do not, however, contain information on ownership or beneficial ownership of these companies. Direct ownership information is available via the business register. This leads the 2025 MPM to once more

¹⁴² The 2024 Rule of Law Reports recommended to Hungary to '[i]ntroduce mechanisms to enhance the functional independence of the media regulatory authority taking into account European standards on the independence of media regulators'.

¹⁴³ Media Pluralism Monitor (2025), p.16.

¹⁴⁴ The 2024 Rule of Law report recommended to Hungary to '[a]dopt legislation to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies'.

¹⁴⁵ On the operation of the National Communications Agency in this field see Corruption Research Center Budapest (2024).

¹⁴⁶ Amnesty International Hungary et al (2025).

¹⁴⁷ International Press Institute (2025), p. 21.

¹⁴⁸ Media Pluralism Monitor (2025), p. 29.

consider this a high-risk area¹⁴⁹. There has been no change to the system of review of market concentration in the media market¹⁵⁰.

There has been no progress to enhance the independence of public service media¹⁵¹. Reports acknowledge that both the Media Act and the Public Service Code enshrine the principle that public service media shall be independent of both government and economic actors and that financing has steadily increased¹⁵². However, no legislative or policy changes have been adopted or are planned to address the concerns expressed in relation to the governance of public service media, in particular in relation to government influence. Reports suggest that the organisation and funding structure remain unchanged, maintaining its opacity and complexity¹⁵³. As a consequence, the 2025 MPM has maintained its very high-risk score for this area based on its findings, among others, that ‘Hungarian public service media is financially dependent on the governing majority in Parliament, is controlled by political interests, and is seen as extremely biased in its reporting’¹⁵⁴. There has thus been no progress on the recommendations made in previous years.

While the accelerated treatment of court cases related to access to information continues, the scope of access to information remains limited especially as regards public funding. The short procedural deadlines introduced in 2023 have continued to prompt accelerated litigation in cases of access to information of public interest. Restrictions to freedom of information introduced in 2023 and 2024 remain in place¹⁵⁵. The National Assembly has still not implemented a 2020 decision of the Constitutional Court requiring legislative amendments to establish effective judicial protection in case of freedom of information requests related to public funds, addressed to the recipients of such funds¹⁵⁶. The enforcement of court orders granting access to documents remains a challenge¹⁵⁷. At the same time, public access to anonymised official documents of a file in administrative proceedings has been removed by a precedent decision of the *Kúria*¹⁵⁸. As regards proactive disclosure, in December 2024, an omnibus law broadened the scope of entities that are required to publish data in the Central Public Data Information

¹⁴⁹ Media Pluralism Monitor (2025), p. 19.

¹⁵⁰ See 2020, 2021 and 2022 Rule of Law Reports, Hungary. An overview of the media market, including main players and trends, can be found in the Media Market Reports prepared by the National Media and Infocommunications Authority.

¹⁵¹ The 2024 Rule of Law Report recommended to Hungary to ‘[s]trengthen the rules and mechanisms to enhance the independent governance and editorial independence of public service media taking into account European standards on public service media’.

¹⁵² International Press Institute (2025), p. 18.

¹⁵³ See Civil Liberties Union for Europe (2025), p. 445.

¹⁵⁴ Media Pluralism Monitor (2025), p. 30.

¹⁵⁵ 2024 Rule of Law Report, Hungary, pp. 28-29.

¹⁵⁶ Decision 7/2020 (V. 13.) AB of the Constitutional Court found that the right to freedom of information extends to all public data and judicial remedies must exist to fulfil this fundamental right vis-à-vis all persons handling public data.

¹⁵⁷ See Rule of Law Report 2024, Hungary. Also, on 5 December 2024, in the context of the enhanced supervision of execution of the judgment of the European Court of Human Rights in the *Kenedi v Hungary* case, the Committee of Ministers of the Council of Europe 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 (CM/Del/Dec(2024)1514/H46-41).

¹⁵⁸ Judgment Pfv.IV.20.384/2024/5. The restriction does not affect access to the decision concluding the administrative procedure.

Register¹⁵⁹. While this is a step forward, entities managing significant amounts of public funding, such as state-owned companies¹⁶⁰, public interest trusts and the Hungarian National Bank and its trusts are not required to publish data in the Register. 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. The Media Pluralism Monitor considers this to be an area presenting very high risk¹⁶¹. Hungary has ratified the Council of Europe Convention on Access to Official Documents¹⁶².

Pressure on journalists and other media professionals has increased, as they continue to encounter numerous and serious challenges to their work. While stakeholders point out that physical attacks against journalists are very rare in Hungary, they draw attention to the prevalence of smear campaigns and derogatory statements against journalists¹⁶³. Some stakeholders report that access to public interest events and government press conferences continues to be denied on a selective basis and that inquiries from the press often go unanswered¹⁶⁴. With the investigative activities carried out by the Sovereignty Protection Office into alleged ‘foreign funding’, pressure on independent journalists and media outlets has increased¹⁶⁵. The 2025 MPM continues to consider the safety of journalists to be an area presenting medium risk¹⁶⁶. The Council of Europe’s Platform to promote the protection of journalism and safety of journalists registered five new alerts relating to, respectively, an investigative outlet accused on engaging in foreign influence and espionage by the Sovereignty Protection Office; two journalists seeking to interview the PM who were obstructed, detained and charged; alerts relating to the Act on Transparency in the Public Sphere and a report claiming that intelligence reports had been drawn up on media outlets and CSOs¹⁶⁷. The Mapping Media Freedom monitoring report has flagged thirty-seven alerts, eight of which concern derogatory statements and smear campaigns targeting journalists; seven of which relate

¹⁵⁹ An online repository where certain public entities upload metadata on their contracts (not the contracts themselves). As of 1 January 2025, Section 37/C of the Freedom of Information Act – amended by the Legal Competitiveness Act – refers, instead of public entities having a budgetary status, to public entities registered by the Hungarian State Treasury, as defined in the Public Finances Act, thereby extending the scope to public bodies, municipalities, national minority self-governments, municipal associations, territorial development councils and other entities assimilated by law to public entities having a budgetary status.

¹⁶⁰ E.g. Hungarian National Asset Management Inc., Hungarian Tourism Agency, Bethlen Gábor Fund Management Inc. These obliged to publish data in accordance with the ‘general disclosure list’ (Annex 1 to the Freedom of Information Act) but non-compliance is not sanctioned. The Fundamental Law limits the definition of public funds to revenues, expenditures and claims of the State. The *Kúria*’s case law (Pfv.IV.20.904/2021/5), confirmed by Decision 3258/2022 (VI. 3.) of the Constitutional Court, limits transparency by relieving subcontractors from the obligation to give access to information related to the use of public funds. This is aggravated by the fact that government entities outsource several tasks (e.g. drafting policy documents, running government communication) to private companies through intermediaries.

¹⁶¹ Media Pluralism Monitor (2025), pp. 13-14.

¹⁶² [The Council of Europe Convention on Access to Official Documents](#) (CETS No. 205), also known as the *Tromsø Convention*, entered into force on 1 December 2020.

¹⁶³ See, among others, the numerous alerts registered by the Media Freedom Rapid Response mechanism.

¹⁶⁴ See Civil Liberties Union for Europe (2025), p. 449. See also Media Freedom Rapid Response Mechanism and the Council of Europe Platform on safety of journalists which have received several alerts of this nature.

¹⁶⁵ Amnesty International Hungary et al (2025), p. 68; Civil Liberties Union for Europe (2025), p. 449. Stakeholders also cite a case where journalists were subjected to polygraph tests by the Constitution Protection Office in relation to news items that later turned out to be false.

¹⁶⁶ Media Pluralism Monitor (2025), pp. 14-15.

¹⁶⁷ Council of Europe Platform to promote the protection of journalism and safety of journalists (2025).

to refusal of accreditation, information or access to political events and six of which are linked to the operation of the Sovereignty Protection Office¹⁶⁸.

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

The Government continues to use its emergency powers extensively, undermining legal certainty and affecting the operation of businesses in the single market. The Government further extended until 14 November 2025 the ‘state of danger’ declared on 25 May 2022 ‘in view of the armed conflict and humanitarian catastrophe in Ukraine and with a view to averting their impact on Hungary’¹⁶⁹. In this way, the Government can override Acts of Parliament. Several emergency measures adopted in the reporting period have an impact on the business environment and do not seem to be related to the ‘state of danger’¹⁷⁰. The Constitutional Court examined various emergency measures in 14 cases in 2024¹⁷¹. Stakeholders reported that the extensive and prolonged use of the Government’s emergency powers has undermined legal certainty¹⁷². The Fifteenth Amendment to the Fundamental Law changes the constitutional rules on the ‘state of danger’ as of 1 January 2026. As a result, setting aside any law through a government decree will require prior parliamentary authorisation. The constitutional rules (introduced in 2022), according to which the initial length of the ‘state of danger’ is 30 days and an extension by the Government requires parliamentary authorisation, remain unchanged. An amendment¹⁷³ adopted on 14 April 2025 clarifies that the parliamentary authorisation to extend the ‘state of danger’ or to set aside any law through a government decree cannot be requested for a period longer than six months.

The law-making process remains a serious source of concern, with certain important legislative processes not being linked to public consultation requirements. Almost 90% of the draft laws were adopted at the initiative of the Government, the vast majority of which (90-92%) were submitted to Parliament after public consultation. Nevertheless, public consultation requirements do not apply with certain important legislative drafts introduced directly by individual members of Parliament or

¹⁶⁸ European Centre for Press and Media Freedom (2025).

¹⁶⁹ Government Decrees 167/2023 of 11 May 2023, 515/2023 of 22 November 2023, 86/2024 of 17 April 2024, 330/2024 of 14 November 2024 and 97/2025 of 12 May 2025 amended Government Decree 424/2022 of 28 October 2022 by extending the ‘state of danger’ until 26 November 2023, 24 May, 19 November 2024, 19 May 2025, respectively. The Government needed an authorisation from the National Assembly to extend the ‘state of danger’. This authorisation was given through Section 2(1) of Act XLII of 2022, as amended by Act XI of 2023, Act LXXII of 2023, Act VIII of 2024, Act LIV of 2024 and Act XXVI of 2025. In parallel, Hungary has been under a ‘crisis situation caused by mass immigration’ since 10 March 2016.

¹⁷⁰ E.g. Government Decree 5/2025 of 25 January 2025 amended the rules on exemption from VAT at source; Government Decree 25/2025 of 27 February 2025 limited the personal scope of public procurement rules; Government Decree 42/2025 of 11 March 2025 introduced profit-margin caps limiting commercial mark-up on 30 basic foodstuffs to 10% of the wholesale price. Certain emergency measures have been incorporated into Acts of Parliament (e.g. excise duty rules, tax rules, social contribution and other types of tax relief).

¹⁷¹ In constitutional complaint procedures where emergency measures were under constitutional review, the average handling time in 2024 was 257 days, far below the deadlines established by the Rules of Procedure. 40% of the petitions aiming at the constitutional review of emergency measures, were decided on the merits. The Constitutional Court also established violation of the Fundamental Law in two decisions (Decisions 9/2024 (IV. 30.) AB and 3323/2024 (VII. 29.) AB).

¹⁷² Stakeholders also consider that the Constitutional Court cannot ensure the effective and timely review of emergency measures. Amnesty International Hungary et al (2025), p. 75; Hungarian Helsinki Committee (2025), p. 32. See also 2024 Rule of Law Report, Hungary, p. 31.

¹⁷³ Act V of 2025 amending Act XCIII of 2021.

parliamentary committees¹⁷⁴. Examples include amendments to the Fundamental Law¹⁷⁵ or legislation with impact on fundamental rights and EU law¹⁷⁶. The Government has continued its practice to include only technical amendments in draft laws and then introduce new and substantive amendments in the bill at a very late stage in the legislative process, through the Committee on Legislation, just before the final vote in Parliament¹⁷⁷. In this way, a regular parliamentary debate and public consultation are avoided. Also, frequent changes of key laws continue to weaken legal certainty and negatively affect the business environment. For instance, last year, the National Assembly and – through emergency measures – the Government, amended 37 times Hungary’s central budget for 2024.

Less than half of the companies surveyed in Hungary express high levels of confidence in the effectiveness of investment protection. 46% of companies are very or fairly confident that investments are protected by law and courts¹⁷⁸. The main reasons among companies for their lack of confidence are the frequent changes in legislation or concerns about quality of the law-making process (32%)¹⁷⁹. 37% of companies perceive the level of independence of the national competition authority (Competition Authority) as very or fairly good¹⁸⁰. A limited number of judicial mechanisms are in place at the level of the *Kúria* to ensure the implementation of administrative court judgments, which include the possibility to quash administrative decisions for continued non-compliance with the court’s instructions. However, these mechanisms do not include disciplinary actions against the responsible officials or the possibility to award direct or consequential damages or compensation¹⁸¹.

Foreign companies, including from other EU Member States, operating in strategic sectors face intensified regulatory pressure from state action. Stakeholders report the continued existence of visible patterns in legislation that cumulatively and significantly damage the financial base for certain foreign investors, including from other EU Member States, leading to de-investment. This is done through tailor-made special taxes (e.g. in the financial, energy and building materials sectors¹⁸²), unpredictable and excessive

¹⁷⁴ The number of bills proposed by individual members was 14 out of 121 laws passed in 2023 and 11 out of 92 in 2024.

¹⁷⁵ E.g. the Thirteenth Amendment to the Fundamental Law (which concerned several constitutional provisions, including the movement of military troops and borrowing by the EU) and the Fourteenth Amendment to the Fundamental Law.

¹⁷⁶ E.g. the Protection of National Sovereignty Law.

¹⁷⁷ In 2024, the Committee on Legislation proposed 8 overreaching amendments, 7 of which were adopted by the National Assembly (information received from the National Assembly). An example where this technique was used was laws affecting the functioning of the justice system, with no prior consultation or plenary debate.

¹⁷⁸ Figure 54, 2025 EU Justice Scoreboard.

¹⁷⁹ Figure 55, 2025 EU Justice Scoreboard. 26% of the surveyed investors perceive the quality, efficiency or independence of justice as a reason for the lack of confidence in investment protection.

¹⁸⁰ Figure 60, 2025 EU Justice Scoreboard.

¹⁸¹ Figure 49, 2025 EU Justice Scoreboard. The data presented reflects exclusively the mechanisms in place at the level of the highest administrative jurisdictions; the same or other mechanisms may be in place at lower instance administrative courts.

¹⁸² In 2021, the Government approved two decrees which established an official price below the market price for basic construction materials such as sand, gravel and cement. The undertakings that extract those materials – almost all of which are controlled by companies established in other Member States – must also pay an additional mining fee set at 90% of the difference between the official price and the sales price exceeding that official price. In addition, the permits to mine depend on maintaining a minimum level of extraction set by the Government. Since those government decrees were approved for a transitional period – originally only for the duration of the COVID-19 outbreak – the National

administrative fines, restrictions on companies' expansion strategies, export restrictions¹⁸³ and the nationalisation of typical company assets/logistics¹⁸⁴. In the retail sector, specific building regulations continue to restrict access to the Hungarian market and special taxes are combined with measures directly or indirectly imposing product price restrictions with the effect that foreign companies are *de facto* discriminated against¹⁸⁵. On 12 September 2024, the Court of Justice found that measures requiring fixed prices and sales obligations for certain agricultural products by a government decree introduced under the 'state of danger' imposed significant restrictions which were not justified or proportionate, and therefore were incompatible with EU law¹⁸⁶. Despite that ruling, Hungary has not yet amended the legal framework and discriminatory product price restrictions affecting foreign companies continue to be applied¹⁸⁷. On 3 October 2024, the Commission opened infringement proceedings against Hungary for failing to bring its retail tax regime in line with the freedom of establishment guaranteed by EU law considering that the regime disproportionately burdens larger foreign companies¹⁸⁸.

The possibility for the Government to interfere with the application of merger control rules continues to create legal uncertainty. The Government can still declare certain mergers and acquisitions to be of 'strategic importance for the national economy'¹⁸⁹. Such transactions do not need to be notified to the Competition Authority which consequently cannot perform its control function. Such Government decrees are not subject to judicial review¹⁹⁰ and increase legal uncertainty for both domestic and foreign companies. This practice has enabled the implementation of a nationalisation strategy in key sectors, such as energy, media and telecommunication.

Institutional checks and balances remain weak. The Constitutional Court, composed of members elected by the National Assembly without the involvement of the judiciary, still reviews the merits of final rulings of ordinary courts in politically sensitive cases¹⁹¹.

Assembly also amended the Mining Law at the same time and authorised the president of the competent supervisory authority to adopt similar measures. On 23 February 2024, the Commission referred Hungary to the Court of Justice; the case is pending (C-144/24).

¹⁸³ In 2021, the Government adopted a decree requiring the prior notification of the export of certain construction materials and products considered of strategic importance and granting a pre-emption right to the State on the notified goods. According to the Government, this was necessary because due to its high energy exposure and proximity to the war zone, Hungary has experienced inflation rates well above the EU average. On 4 August 2023, the Commission referred Hungary to the Court of Justice (C-499/23) on this matter.

¹⁸⁴ Ost-Ausschuss – German Eastern Business Association (2025), WKÖ – Austrian Federal Economic Chamber (2025).

¹⁸⁵ Government Decree 6/2022 of 14 January 2022 imposing fixed prices (from 2022 to 2023) and 162/2023 of 5 May 2023 requiring mandatory discounts (from 2023 to 2024).

¹⁸⁶ Judgment of the CJEU, case C-557/23, *SPAR Magyarország* concerning Government Decree 6/2022.

¹⁸⁷ E.g. Government Decrees 42/2025 of 11 March 2025 and 93/2025 of 8 May 2025 introducing price margin restrictions (as of March and May 2025, respectively). On 18 June 2025, the Commission opened infringement procedures against Hungary (INFR(2025)2052 and INFR(2025)2102) for imposing price margin restrictions on non-Hungarian companies. The first procedure concerns restrictions on the sale of certain food products by food retailers. The second procedure covers similar restrictions for the sale of certain non-food products by drugstores.

¹⁸⁸ INFR(2024)4022. On 18 June 2025, the Commission sent a reasoned opinion.

¹⁸⁹ Section 24/A of the Competition Act.

¹⁹⁰ The Constitutional Court could review the constitutionality of such individual measures (see Decision 16/2020. (VII. 8.) AB, para 33).

¹⁹¹ 2024 Rule of Law Report, Hungary, p. 35. On 13 June 2024, the Constitutional Court quashed the decision of the *Kúria* that dismissed the complaint – filed by a candidate supported by the governing parties – regarding an opposition candidate's campaign activity during the municipal elections

On 20 May 2025, the National Assembly elected its Deputy Speaker and the Prosecutor General to the Constitutional Court¹⁹². The Constitutional Court does not have a case allocation scheme and is not bound by procedural deadlines when hearing constitutional complaints¹⁹³. Concerns regarding the independence and effective functioning of the Commissioner for Fundamental Rights remain¹⁹⁴. 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 parties¹⁹⁵. Similar concerns have also been expressed in relation to the Competition Authority and the Public Procurement Authority which are seen as selectively applying the rules¹⁹⁶.

Concerns related to the absence of procedural safeguards and effective oversight in case of secret surveillance measures outside criminal proceedings have not been addressed¹⁹⁷. The execution of relevant judgments of the European Court of Human

(Decision 3210/2024. (VI. 13.) AB). On 17 December 2024, the Constitutional Court quashed the *Kúria* decision which allowed a referendum on the organisation of Olympic games in Budapest (Decision 24/2024. (XII. 30.) AB).

¹⁹² The proposal is made by a parliamentary committee. According to the Constitutional Court Act, as amended by Act LXVII of 2024 as of 1 January 2025, while it is still required that candidates for the office of a member of the Constitutional Court have a law degree and be either academics with ‘outstanding theoretical knowledge’ (meaning, according to the law, university professors or doctors of the Hungarian Academy of Sciences) or have at least twenty years of professional experience in the field of law, it is no longer necessary that such professional experience ‘in the field of law’ be acquired in a position for which there is a statutory requirement to have a law degree. On 16 June 2025, the Venice Commission recommended clarifying what kind of experience ‘in the field of law’ (acquired in a position for which a law degree is not needed by law) would qualify a candidate to be appointed. See Venice Commission (2025), paras 56 and 62.

¹⁹³ 2024 Rule of Law Report, Hungary, pp. 31 and 35. According to the Government, the case allocation scheme of the Constitutional Court has customary nature. When allocating the case, its President takes the specific knowledge (specialisation) and the workload of members, as well as the pending cases that are interrelated, into consideration when assigning the cases to members. Although there is no statutory deadline for the final decision to be taken in a constitutional complaint procedure, the Internal Rules of Procedure (*‘Ügyrend’*) establish internal deadlines that ensure the closure of cases within reasonable time.

¹⁹⁴ 2024 Rule of Law Report, Hungary, p. 33 and Hättér Society et al (2025). According to the Government, in 2024 the Commissioner received 8 853 individual complaints and inquiries, and public authorities demonstrated a high rate of compliance (approximately 90%) with the recommendations set out in the Office’s publicly available and transparent reports. According to the Government, this shows both the Commissioner’s functional independence and his impact in safeguarding fundamental rights.

¹⁹⁵ The State Audit Office imposed large fines on opposition parties on several occasions (HUF 660 million, c. EUR 1.7 million in 2017, HUF 520 million, c. EUR 1.3 million in 2024). These decisions were confirmed by the Budapest Regional Court (judgments 104.K.701.004/2024/43, 104.K.701.005/2024/40 and 104.K.701.006/2024/37 of 18 March 2025). At the same time, it did not impose fines on the ruling party, despite evidence of similar practices in campaign financing (e.g. buying services at reduced prices, sharing campaign costs with related organisations, etc.) (see OSCE ODIHR (2022), p. 3, Transparency International Hungary (2022) and Transparency International Hungary (2023)).

¹⁹⁶ Amnesty International Hungary et al (2025), p. 52. For instance, the Competition Authority unduly singled out a foreign-owned retailer by enforcing various rules in an apparent attempt to dissuade it from challenging government-imposed price regulations. Also, the Competition Authority imposed a HUF 11 billion (EUR 26.7 million) cartel fine on a chemical company whose owner openly supported the opposition; on 3 October 2024, the Budapest Regional Court quashed the Authority’s decision as ill-founded (judgment 105.K.706.686/2021/138). The Public Procurement Authority failed to investigate the award of two public contracts from a contracting authority primarily owned by the same Government-affiliated businessman as the winner of the tenders.

¹⁹⁷ See 2024 Rule of Law Report, Hungary, p. 34.

Rights is still pending¹⁹⁸. On 12 June 2025, the Committee of Ministers of the Council of Europe urged the Hungarian authorities to adopt measures required to bring the domestic legislation on secret surveillance for national security purposes fully and effectively in line with the Convention requirements¹⁹⁹. In a new judgment of 28 November 2024 related to the wiretapping of a journalist, the European Court of Human Rights found that there had been no adequate procedural safeguards in place for the applicant to challenge the alleged use of secret surveillance against her with a view to discovering her journalistic sources²⁰⁰. In previous cases of journalists allegedly targeted by the Pegasus spyware, the National Data Protection and Freedom of Information Authority found no proof that the bodies authorised to conduct secret surveillance would have used the spyware for any purpose other than the discharge of the duties specified by law and those specified by the company providing the spyware (prevention and detection of criminal acts and acts of terrorism)²⁰¹.

On 1 January 2025, Hungary had 47 leading judgments of the European Court of Human Rights pending implementation, an increase of 2 compared to the previous year²⁰². At that time, Hungary's rate of leading judgments from the past 10 years that had been implemented was at 26% (compared to 24% in 2024; 74% remained pending), and the average time that the judgments had been pending implementation was 6 years and 6 months (compared to 6 years and 2 months in 2024)²⁰³. The oldest leading judgment, pending implementation for more than 15 years, concerns the violation of the right to freedom of assembly²⁰⁴. As regards the respect of payment deadlines, on 31 December 2024 there were 32 cases in total awaiting confirmation of payments (compared to 47 in 2023)²⁰⁵. On 16 June 2025, the number of leading judgments pending implementation had increased to 52²⁰⁶.

A deteriorating environment for civil society organisations and legal uncertainty further obstruct civic space²⁰⁷. The space for civil society continues to be rated as 'obstructed'²⁰⁸. A new law²⁰⁹ moves the register of civil society organisations (CSOs) from the courts to a central administrative authority as of 1 January 2027. Stakeholders

¹⁹⁸ Judgments of the ECtHR, 37138/14, *Szabó and Vissy v Hungary* and 58032/16, *Hüttl v Hungary*.

¹⁹⁹ CM/Del/Dec(2025)1531/H46-22.

²⁰⁰ Judgment of the ECtHR, case 31091/16, *Klaudia Csikós v Hungary*.

²⁰¹ National Data Protection and Freedom of Information Authority (2022). According to the Government, Hungarian legislation does not differentiate between professions and professional activities (e.g. 'journalist, human rights activist, opposition politician, lawyer and businessman') with regard to secret surveillance when it does not restrict in that respect national security services in carrying out the activities under Section 56 of National Security Act.

²⁰² For an explanation of the supervision process, see the [website](#) of the Council of Europe.

²⁰³ All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2025. EIN (2025), written input, p. 5.

²⁰⁴ Judgment of the ECtHR, 5529/05, *Patyi and Others v Hungary*, pending implementation since 2009. According to the Government, the length of this process is often due to the working methods of the Committee of Ministers, involving constant monitoring of the development of domestic jurisprudence and grouping together cases concerning remotely similar issues.

²⁰⁵ Council of Europe (2025), p. 156.

²⁰⁶ Data according to the online database of the Council of Europe (HUDOC).

²⁰⁷ The 2024 Rule of Law Report recommended that Hungary '[r]emove obstacles affecting civil society organisations and foster a safe and enabling civic space, including by repealing legislation that hampers their capacity of working, in particular the immigration tax'.

²⁰⁸ CIVICUS (2025). In 2023, approximately 61 076 CSOs were active according to the Hungarian Central Statistical Office; no forced dissolutions of CSOs were reported.

²⁰⁹ Act LIX of 2025.

report that government attacks on independent CSOs have continued²¹⁰. On 3 October 2024, the Commission decided to refer Hungary to the Court of Justice over the Protection of National Sovereignty Law²¹¹. The Sovereignty Protection Office started several investigations concerning various civil society organisations, notably anti-corruption CSOs²¹², including those receiving EU funds. In some of these reports, the Office labelled the activities of several Commission intermediaries tasked with the disbursement of the EU's Citizens Equality Rights and Values (CERV) programme as carrying 'a serious sovereignty risk'²¹³. On 13 May 2025, a draft law 'on transparency in public life' was tabled in the National Assembly. On 4 June 2025, it was announced that the parliamentary work on this draft law would be postponed to the autumn session. The draft law increases the powers of the Sovereignty Protection Office, introducing significant consequences for the activities of civil society organisations, media outlets and other entities within its scope, and considerably restricts their access to funding. In particular, the investigations of the Office would serve as the basis for a government decree listing entities whose activities are qualified as endangering 'Hungary's sovereignty through influence on public life'²¹⁴. The draft law sparked protest from independent media outlets and civil society organisations, which deem it serves to restrict critical voices in Hungary²¹⁵. The Commission has voiced its serious concerns about this draft law with the Hungarian authorities²¹⁶. Recent amendments to legislation and the Constitution, as well as their application in practice resulted in legal uncertainty for the organisers and participants of public assemblies aimed at promoting equality and diversity. Stakeholders note that the distribution of public funding continues to be uneven²¹⁷, untransparent, privileging government-aligned organisations against CSOs

²¹⁰ Amnesty International Hungary et al (2025), p. 88.

²¹¹ The case is pending before the Court of Justice (C-829/24). The Commission considers that the Protection of National Sovereignty Law breaches several fundamental freedoms and secondary legislation in the internal market, several fundamental rights enshrined in the EU Charter of Fundamental Rights and EU Data protection legislation. The European Parliament, fourteen Member States and Norway have intervened in the case in support of the Commission's position.

²¹² The law has had a deterring effect on CSOs that are members of monitoring committees of EU funded programmes. Also, during the 5 December 2024 meeting of the Partnership Agreement monitoring committee they expressed concerns that the Sovereignty Protection Office can target them for their work.

²¹³ Sovereignty Protection Office (2024), Sovereignty Protection Office (2025). Until March 2025, Hungarian entities were granted more than EUR 26.5 million in total for the implementation of CERV-funded projects. Most of the beneficiaries are private non-profit organisations and most of the grants are running. See the Financial Transparency System and the EU Funding and Tenders portal for details.

²¹⁴ According to the draft law, once an entity is listed, it may not receive foreign support without prior authorisation from the tax administration. The potential duration of the authorisation procedure can last 180 days, even where the support is ultimately qualified as not being granted to influence public opinion. Listed entities would be required to request from their donors a written declaration that the support provided to it has not been received from a foreign source. In addition to the restriction on foreign support, entities will be excluded from a state subsidy scheme whereby an entity can be nominated by individual tax-payers to receive an amount corresponding to one per cent of their personal income tax. Senior officers, founders of a listed entity and members of its supervisory committee would be subject to enhanced customer due diligence by financial institutions and would be obliged to make a public declaration of assets.

²¹⁵ European Centre for Press and Media Freedom (2025), Hungarian Helsinki Committee (2025b), International Federation of Journalists (2025).

²¹⁶ On 23 May 2025, the Commission sent a letter to the Hungarian authorities expressing concerns about the draft law.

²¹⁷ The total income of associations and foundations in 2023 was HUF 1 345 billion (EUR 3.36 billion), more than the year before (HUF 1 270 billion; EUR 3.2 billion). Of this, some 40% came from public funding, 22% from private sources, with the rest originating from business and other income.

critical of government policies, which are not able to secure public funding in Hungary²¹⁸. Overall, no progress has been made on the recommendation and the situation has instead further deteriorated.

Crowdsourcing remained an important source of income for many CSOs. The majority of CSOs work on a small annual budget (less than HUF 5 million or EUR 12 500) on a mostly voluntary basis, which seriously limits their capacities. This is visible especially in the countryside.

²¹⁸ Amnesty International Hungary et al (2025), p. 90. According to the Hungarian Central Statistical Office, funding provided through the National Cooperation Fund increased from EUR 8.5 million (HUF 3.4 billion) in 2012 to EUR 32.6 million (HUF 13 billion) in 2025. Also, the State provides free professional assistance to CSOs across the country through Civil Community Service Centres (*'Civil Közösségi Szolgáltató Központok'*).

Annex I: List of sources in alphabetical order*

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Act LVII of 1996 on the prohibition of unfair trading practices and unfair competition ('the Competition Act')

Act CLXXXV of 2010 on media services and on the mass media ('the Media Act')

Act CXCV of 2011 on public finances ('the Public Finances Act')

Act CXII of 2011 on the right of informational self-determination and freedom of information ('the Freedom of Information Act')

Act CLI of 2011 on the Constitutional Court ('the Constitutional Court Act')

Act CLXI of 2011 on the organisation and administration of courts ('the Organisation and Administration of Courts Act')

Act CLXII of 2011 on the legal status and remuneration of judges ('the Legal Status and Remuneration of Judges Act')

Act CLXIV of 2011 on the status of the prosecutor general, prosecutors and other prosecution employees and the prosecution career of Hungary ('the Legal Status of Prosecutors Act')

Act CXXX of 2016 on civil procedure ('the Civil Procedure Code')

Act I of 2017 on administrative court procedure ('the Code of Administrative Court Procedure')

Act XC of 2017 on criminal procedure ('the Criminal Procedure Code')

Act LV of 2018 on freedom of assembly ('the Freedom of Assembly Act')

Act XCIII of 2021 on the coordination of defence and security activities

Act LV of 2023 on Hungary's central budget for the year 2024

Act LXXXVIII of 2023 on the protection of national sovereignty ('the Protection of National Sovereignty Law')

Act LXXXV of 2024 amending certain laws for deregulation in the interests of legal competitiveness ('the Legal Competitiveness Act')

Act V 2025 amending certain rules in relation to the Fifteenth Amendment

Act XX of 2025 amending certain laws in relation to the obligation of members of the European Parliament to submit asset declarations

Annex II: Country visit to Hungary

The Commission services held virtual meetings in February 2025 with:

- Amnesty International Hungary
- *Átlátszó*
- Bea Bodrogi lawyer, media expert
- Buda Central District Court
- Corruption Research Center Budapest
- ELTE Media Department
- Hungarian Association of Journalists (*MÚOSZ*)
- Hungarian Association of Judges (*MABIE*)
- Hungarian Bar Association (*MŰK*)
- Hungarian Civil Liberties Union (*TASZ*)
- Hungarian Helsinki Committee
- Integrity Authority
- K-Monitor
- *Kúria* (Supreme Court)
- Mérték Media Monitor
- Ministry for European Affairs
- Ministry of Finance
- Ministry of Interior
- Ministry of Justice
- National Assembly (*Országgyűlés*)
- National Data Protection and Freedom of Information Authority (*NAIH*)
- National Judicial Council (*OBT*)
- National Office for the Judiciary (*OBH*)
- Office of the Commissioner for Fundamental Rights
- Prosecution Service of Hungary
- Res Iudicata - Judges for Social Awareness Association
- State Audit Office (*Állami Számvevőszék*)
- Transparency International Hungary

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

- Amnesty International
- Araminta
- Civil Liberties Union for Europe
- Civil Society Europe
- European Civic Forum
- European Partnership for Democracy
- European Youth Forum,
- International Commission of Jurists
- International Federation for Human Rights (FIDH)
- JEF Europe

- Philea – Philanthropy Europe Association.
- Transparency International