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COMMISSION STAFF WORKING DOCUMENT

2026 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

2026 Rule of Law Report
The rule of law situation in the European Union

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ABSTRACT

The new Government has engaged in intense reform efforts to restore the rule of law. Following continued dialogue with the Commission under the Recovery and Resilience Plan and the general regime of conditionality, several legislative reforms were advanced. Further constitutional amendments are being considered regarding the justice system, the anti-corruption framework and institutional issues related to checks and balances.

The National Judicial Council continued to exercise the powers it acquired through the 2023 judicial reform. In January 2026, the Council issued statements in defence of judges who faced undue pressure. The *Kúria* continued to enforce uniformity of case law through its uniformity panel. The transparency of case allocation in lower-instance courts has not been improved. The election procedure for the Prosecutor General, combined with the hierarchical structure of the prosecution service, gives rise to a risk of undue political interference in individual cases. Salaries in the justice system have been increased further, while no measures have been taken to ensure that such increases are carried out in a structured way. The justice system performs efficiently overall.

New legislation adopted in June 2026 aims to tackle obstacles to the effective functioning of the Integrity Authority and the Anti-Corruption Task Force. The number of indictments for corruption-related crimes has generally increased but there has so far been no progress to establish a robust track record in cases of high-level corruption. Following Hungary’s request, the Commission has confirmed Hungary’s participation in the EPPO. Newly adopted legislation strengthens the Integrity Authority and improves the system of asset declarations, providing for effective oversight and enforcement. No steps have been taken yet to adopt comprehensive legislation on lobbying and revolving doors, and shortcomings related to the transparency of the financing of political parties remain. New legislation addresses corruption risks in public procurement procedures and increases the transparency of private equity funds.

Legislation adopted in June 2026 amending the Media Act introduces reforms to both the rules governing the national media regulator, as well rules on the governance and funding of public service broadcasting. Transparency and fairness in the distribution of state advertising has not been addressed yet. Although the processing of court cases relating to access to information has been accelerated, the scope of access remains limited, particularly with regard to the use of public funding. Several journalists and other media professionals encountered serious challenges to their work during a large part of the reporting period.

The former Government used its emergency powers extensively, undermining legal certainty and affecting businesses’ ability to operate in the single market. Upon expiry of the ‘state of danger’ on 13 May 2026, the new government did not extend it further. Foreign companies operating in strategic sectors continue to face intensified regulatory pressure from state action. The legal framework that allows the selective application of competition rules further weakens legal certainty for businesses. The absence of procedural safeguards and effective oversight in the event of secret surveillance measures remains a concern. The Sovereignty Protection Office has been abolished, whilst obstacles hindering the work of independent civil society organisations are yet to be removed. Under the new legislation, public interest trusts will be phased out.

RECOMMENDATIONS

Overall, based on the recommendations in the 2025 Rule of Law Report, considering other developments that took place in the period of reference, and 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 country-specific recommendations under the European Semester on reinforcing the anti-corruption framework and the quality and transparency of the decision-making process, the Commission concludes the following:

- No progress has been made on the transparency of case allocation systems in lower-instance courts, as the previous government limited itself to addressing deficiencies in the rules on case allocation at the level of the *Kúria*. Therefore, 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.*
- No further progress has been made yet to ensure that the ongoing increase in the remuneration of judges, prosecutors and judicial and prosecutorial staff is carried out in a structured manner. Therefore, it is recommended to Hungary to *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.*
- As new legislation was adopted that further develops the system of asset declarations, the recommendation to further improve the system of asset declarations and provide for effective oversight and enforcement has been fully implemented. No progress has been made yet on putting forward comprehensive legislative reforms on lobbying and revolving doors. As these gaps in integrity rules remain unaddressed, it is recommended to Hungary to *strengthen the integrity framework by adopting comprehensive legislative reforms on lobbying and revolving doors*.
- No progress has been made on establishing a robust track record of investigations, prosecutions and final judgments for high-level corruption cases, given that the positive changes recently initiated in the anti-corruption framework have not yet come into effect. Therefore, it is recommended to Hungary to *take further measures to ensure a track record of investigations, prosecutions and final judgments for high-level corruption cases*.
- Some progress has been made to ensure that there are no obstacles hindering the work of civil society organisations and foster a safe and enabling civic space, given measures such as the abolition of the Sovereignty Protection Office were taken, while legislation hampering their capacity of working has not been repealed. Therefore, it is recommended to Hungary to *further ensure that there are no obstacles hindering the work of civil society organisations, including by repealing legislation that hampers their capacity of working, and to further foster a safe and enabling civic space*.

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

- Some progress has been made on introducing mechanisms to enhance the functional independence of the media regulatory authority taking into account European standards on the independence of media regulators, in the light of recent legislation which has introduced reforms in this area.
- No progress has been made yet to ensure fair and transparent distribution of advertising expenditure by the state and state-owned companies, as no legislative or other measures have been proposed.
- Some progress has been made 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, in the light of recent legislation which has introduced reforms in this area.

Given that the topics of the three recommendations above are covered by provisions of the European Media Freedom Act (EMFA), while the Rule of Law Report will continue to monitor significant developments and report on their impact, further follow-up will be ensured as part of the Commission's support to Member States and enforcement of the EMFA.

I. JUSTICE SYSTEM[1]

Independence

The level of perceived judicial independence in Hungary continues to be low among both the general public and companies. Overall, 31% of the general population and 33% of companies perceive the level of independence of courts and judges to be 'fairly or very good' in 2026[2]. The perceived level of independence among the general public has significantly decreased in comparison with 2025 (38%), as well as in comparison with 2022 (43%). The perceived level of judicial independence among companies has decreased since 2025 (38%) and has slightly decreased in comparison with 2022 (34%).

The National Judicial Council has continued to exercise the powers it acquired through the 2023 judicial reform[3]. In particular, the National Judicial Council (NJC) rejected the decisions of the President of the National Office for the Judiciary (NOJ) to annul the application procedures for two judicial posts, and did not agree with the secondment of a judge to the National Directorate-General for Hospitals and with the temporary transfer of two judges[4]. In 2025, the NJC requested the NOJ President on three occasions to grant access to documents in order to get acquainted with the proposals and comments received from the courts in connection with certain bills and regulations[5]. The NJC seized the Constitutional Court twice to defend its prerogative to be consulted on legislative proposals affecting the justice system[6]. On 18 May 2026, the NJC proposed that the procedural rules introduced in 2025 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 case be repealed[7]. On the same day, the Council gave a positive opinion on the suitability of a candidate for the post of *Kúria* Vice-President[8].

The National Judicial Council has approved the findings of a report exploring measures to make the Council more effective. The report prepared by an ad hoc committee[9] proposes

1 An overview of the institutional framework for all four pillars can be found here.

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

3 See 2023 Rule of Law Report, Hungary, pp. 3-5. Hungary adopted a legislative reform which established stronger powers for the NJC and ensures that the NJC gives a binding opinion on a number of important matters related to the administration of the justice system as regards both individual decisions and general regulations issued by the NOJ President. The NJC now has access to all documents, information and data related to the administration of courts. It also needs to be consulted on legislative proposals affecting the justice system and is able to propose to the Government to initiate new legislation on the same matters.

4 Decisions 76/2025 of 11 June 2025, 99/2025 of 15 July 2025, 115/2025 of 3 September 2025, and 147/2025 of 5 November 2025.

5 Country visit Hungary, Hungarian Government,

6 See Section 108/A(9) of the Organisation and Administration of Courts Act and Section 36/A(1) of the Constitutional Court Act. On 9 September 2025, the Constitutional Court dismissed the NJC's application related to the adoption of the 2025 judicial reform (see 2025 Rule of Law Report, Hungary, p. 5). On 19 February 2026, the NJC challenged Government Decree 15/2026 of 3 February 2026, an emergency measure obliging courts to discontinue ongoing cases related to the 'solidarity levy'; on 6 May 2026, the Constitutional Court annulled the justice-related provisions of the emergency measure with retroactive effect (case IX/00673/2026) (see pillar IV).

7 Decision 73/2026 (V.18.) OBT. See 2025 Rule of Law Report, Hungary, p. 10.

8 Decision 72/2026 (V.18.) OBT.

9 On 14 February 2024, the Council set up an ad hoc committee to analyse the last election process and make recommendations for possible changes to the legislative framework (2024 Rule of Law Report, Hungary, p.

several amendments to the Organisation and Administration of Courts Act. These include extending the NJC's supervisory powers over the administrative activity of the *Kúria* President[10]. Furthermore, the report suggests extending the NJC's supervisory powers to also cover the publication of calls for applications to judicial posts by the NOJ President and the *Kúria* President. It also proposes requiring the Minister of Justice to issue a new decree on the points system applicable to the assessment of applications for judicial posts, in order to enable the NJC to exercise its co-decision-making powers in that respect. Additionally, the report suggests changing the way *Kúria* judges are represented in the NJC[11], and introducing the possibility of re-electing NJC members. The NJC approved the report on 1 July 2026.

In January 2026, the National Judicial Council issued statements in defence of judges who faced undue pressure. A number of judges continued to face undue pressure, particularly in relation to internal and public debates concerning key issues such as judicial independence and the freedom of expression of judges. In November and December 2025, it was reported that several judges were subject to political attacks and smear campaigns based on leaked personal data[12]. The presidents of the courts where the affected judges adjudicate did not condemn the attacks but launched internal investigations into the integrity of those judges[13], while public statements by the *Kúria* President put into question the impartiality of the judges concerned[14]. Subsequently, the NJC issued statements in defence of judicial independence and judges' freedom of expression, which then led to a public debate within the NJC and between the NJC and the *Kúria* President[15].

Amendments to the rules regarding the career of judges will further strengthen judicial independence. The omnibus law of June 2026 removed the transitional provision allowing sitting members of the Constitutional Court, who have already become judges without following the normal application procedure, to be appointed to the regional appeal court of

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5). See also National Judicial Council (2025), pp. 71-73; National Judicial Council (2026b), pp. 23-48; National Judicial Council (2026a), p. 8.

10 The NJC's powers do not extend to supervising the administrative duties of any court president, including those of the *Kúria* President (Kúria, written reply).

11 The NJC is composed of the *Kúria* President *ex officio* and 14 judges-members (and 14 substitute members) elected by their peers for a period of six years. Judges-members (one court of appeal judge, six regional court judges and seven district court judges) are elected by a conference of delegates from among delegate judges. The full court of the *Kúria* and the plenary sessions of each of the five regional appeal courts and the 20 regional courts elect 2 to 20 delegates.

12 See NJC (2026), p. 9; Hungarian Association of Judges (2026), pp. 9-10, 21; MEDEL (2026), pp. 10-11.

13 Integrity procedures are governed by internal regulations, and court presidents conduct investigations without the safeguards offered by service courts. The service courts are composed of members elected by the NJC from among judges, hear cases related to the assessment, fitness for office and disciplinary liability of judges. The *Kúria* President regularly questions in public the legitimacy of the service courts (2025 Rule of Law Report, Hungary, p. 7). See also HVG.hu (2026).

14 On 6 November 2025, the *Kúria* issued a press release suggesting that the concerned judges might be held responsible for breaching their duties, and stating that if the *Kúria* received credible information, it would be ready to conduct the appropriate procedures (Kúria (2025b)).

15 Kúria (2025b), Kúria (2026). In January 2026, the NJC rejected a motion by five of its judges-members to amend the Code of Ethics for Judges, which would have clarified that registering with a political party constitutes political activity that is prohibited for judges (National Judicial Council (2026c), pp. 7-26). On 11 June 2026, the Constitutional Court rejected the motion filed by the *Kúria* President that questioned the NJC's competence to issue a Code of Ethics and highlights the absence of a reference to the Fundamental Law in its text. The Constitutional Court found that it cannot review the Code of Ethics because it is not a normative act. The Constitutional Court established ex officio as a constitutional requirement that if ethical rules affect the legal status of judges, the guarantees pertaining to them must be regulated in statute. It called upon Parliament to fulfil its legislative duty by 31 March 2027 (Decision 4/2026. (VI. 19.) AB).

their choice after their service at the Constitutional Court[16]. In June 2026, the new Government submitted a draft constitutional amendment ('the Seventeenth Amendment') for public consultation; it was adopted by the National Assembly on 13 July 2026 and is yet to be promulgated. The Seventeenth Amendment to the Fundamental Law would allow the judiciary to play a more decisive role in the appointment and removal from office of the *Kúria* President and the NOJ President[17].

The *Kúria* continues to enforce uniformity of case law through its uniformity panel[18]. From 1 January 2026, the *Kúria*'s role in ensuring case law consistency was reinforced by expanding the scope for reviewing binding lower court judgments on points of law[19]. A uniformity decision of the *Kúria* is binding on all courts[20]. Under national law, only the *Kúria*'s uniformity panel may amend or set aside a uniformity decision[21]. Also, the adjudicating panels of the *Kúria* may only depart from the legal interpretation set out in the *Kúria*'s published precedent decisions by initiating a uniformity procedure before the uniformity panel. The *Kúria* considers that only the uniformity panel can remove the binding force of the legal interpretation provided by the *Kúria* in previously published precedent decisions. According to the *Kúria*, where such precedent decision of the *Kúria* would be contrary to the interpretation given by the Court of Justice of the EU (Court of Justice), the *Kúria*'s uniformity panel would need to decide on the binding force of such precedent decision of the *Kúria*[22]. 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 law[23]. Certain uniformity decisions have raised questions of compatibility with existing preliminary rulings of the Court of Justice. This has prompted courts to refer further questions to the Court of Justice[24].

There has been no progress on the recommendation to improve the transparency of case allocation in lower-instance courts[25]. According to the former Government, there was no need to revise the legislation applicable to case allocation in lower courts[26]. Stakeholders

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[16] Section 41 of the omnibus law of June 2026 amending Section 232/X(1) of the Legal Status and Remuneration of Judges Act. See also 2023 Rule of Law Report, Hungary, p. 7.

[17] T/324.

[18] The 'uniformity complaint panel' was renamed to 'uniformity panel' as of 15 February 2026.

[19] Act XLIX of 2025 amended the Code of Civil Procedure by allowing the parties in each case to request that the *Kúria* review the binding decision of the lower-tier courts on points of law. This means that all legal disputes now may be considered by the *Kúria*, enabling the highest court to provide an interpretation of the law that lower courts must adhere to.

[20] See Article 25(3) of the Fundamental Law. If a departure nevertheless occurs, the parties may avail themselves of review proceedings before the *Kúria* on points of law (Constitutional Court Decision 3002/2025. (I. 21.), paras 37-39) or – in the case of *Kúria* decisions – initiate uniformity complaint proceedings before the *Kúria*'s uniformity panel (Jpe.II.60.012/2024/7, para 41).

[21] Section 32(1)(a) of the Organisation and Administration of Courts Act and uniformity decision 15/2025. JEH, para 67.

[22] Kúria, written reply.

[23] CJEU judgment, *Global Ink Trade*.

[24] These cases affected for instance foreign currency loan agreements (C-679/24 - *UniCredit Bank and Momentum Credit*; C-761/24 - *AXA Bank Belgium and Others*; C-351/25 - *Trive Bank Hungary and Erinum Capital*; C-1/26 - *ERSTE Bank Hungary and Intrum*) and the return of illegally staying third-country nationals (C-26/25, *Bukla*). On 16 July 2026, the CJEU handed down a judgment in *Bukla*.

[25] The 2025 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'. No progress was previously assessed on this recommendation in 2024.

[26] Country visit, Hungary.

maintain their concerns as regards the lack of transparency of case allocation in lower courts[27]. The most recent survey by the European Network of Councils for the Judiciary shows that 30% of Hungarian judges believe that, over the past three years, not all cases have been allocated in accordance with the established rules, with the aim of influencing the outcome of particular cases[28]. Therefore, no progress has been made on the recommendation.

The election procedure for the Prosecutor General, combined with the hierarchical structure of the prosecution service, gives rise to a risk of undue political interference in individual cases. The Prosecutor General is elected by the National Assembly without the involvement of a prosecutorial body and without strict eligibility criteria[29]. Hungary has not implemented the recommendation of the Venice Commission on further amending the eligibility criteria and considering the introduction of guarantees in the appointment process, such as the establishment of a Prosecutorial Council in order to de-politicise the position of the Prosecutor General[30]. The hierarchical structure of the prosecution service remains intact, which – viewed together with the lack of internal checks and balances – constitutes a risk that senior prosecutors can influence the work of subordinate prosecutors, including in individual cases[31]. Hungary has still 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[32].

Quality

Salaries in the justice system have been increased further, while no progress has yet been made on the recommendation to take measures to ensure that such increases are carried out in a structured way[33]. As of 1 January 2026, the National Assembly further increased the salary base for judges by 10%[34]. According to stakeholders, the absence of automatic indexation or similar guarantees makes salary adjustments to account for inflation unpredictable[35]. Also, the statutory system of remuneration for court staff makes their

27 European Network of Councils for the Judiciary (2026), p. 13. Hungarian Association of Judges (2026), p. 8; MEDEL (2026), p. 9.
28 Figure 54, 2026 EU Justice Scoreboard.
29 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 is required to be elected as the Prosecutor General.
30 Venice Commission (2025), paras. 29, 43-45.
31 2025 Rule of Law Report, Hungary, p. 8; Amnesty International Hungary et al. (2026), p. 16; Hungarian Helsinki Committee (2026), p. 16; K-Monitor (2026), p. 10.
32 GRECO (2023), pp. 9-10.
33 The 2025 Rule of Law Report recommended that Hungary '[t]ake 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'.
34 From HUF 651 660 (around EUR 1 840) to HUF 716 830 (around EUR 2 024). See Section 67 of Act LXIX of 2025 on the 2026 annual central budget of Hungary. In December 2024, the National Assembly adopted the 2025 annual central budget raising the salary base for judges by 15% as of 1 January 2025 (see 2025 Rule of Law Report, Hungary, pp. 8-9).
35 Amnesty International Hungary et al. (2026), pp. 4, 23; European Network of Councils for the Judiciary (2026), p. 13; country visit, Hungary, National Judicial Council. Contrary to salaries in the justice system, the salaries of several other categories of key public officials – including the top management of the Competition Authority, the Public Procurement Authority, the National Media and Infocommunications Authority, 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 (2025 Rule of Law Report, Hungary, p. 9).

recruitment difficult in the central region[36]. Therefore, no further progress has yet been made on the recommendation.

Shortcomings in the legal aid scheme remain. Stakeholders pointed out that the cost of litigation often prevents small and medium-sized enterprises from defending their economic interests in court, while access to free alternative dispute resolution in front of conciliation boards has been extended[37]. The eligibility threshold for legal aid in civil procedure is high, meaning that even a person with an income well below the poverty threshold may not be eligible for legal aid[38]. On 21 November 2025, the Commission opened an infringement procedure against Hungary for failing to correctly transpose EU rules on legal aid in criminal proceedings[39]. Although in 2026 the fees for defence lawyers under the legal aid scheme were raised[40], they are still regarded as critically low, risking to have a negative impact on access to justice and the right to a fair trial[41]. As reported in the 2025 Rule of Law Report, Hungary is lagging behind as regards specific arrangements for access to justice for persons at risk of discrimination and older persons[42].

Overall, the level of digitalisation in the justice system remains high. Hungary performs particularly well in terms of digital solutions for initiating and tracking civil, commercial and administrative proceedings, and in providing the public with online access to published judgments. Also, Hungary is among the top-performing Member States with regard to implementation of digital solutions for conducting and following court proceedings in criminal cases[43]. However, stakeholders have raised concerns about the confidentiality and reliability of communication systems in practice, which they fear may hinder an effective defence when holding hearings remotely for detained individuals[44].

Efficiency

The justice system continues to perform efficiently overall. The time taken to reach a decision in civil and commercial cases in first instance courts has increased slightly, but at 140 days (compared to 135 days in 2023) it remains one of the lowest in the EU. The estimated time taken to resolve administrative cases at first instance increased slightly (from

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[36] Hungarian Association of Judges (2026), pp. 11-12; MEDEL (2026), p. 11.

[37] Country visit, Hungary, Hungarian Chamber of Commerce and Industry. Conciliation boards attached to regional chambers of commerce and industry have been operating in consumer/business dispute resolution for over 25 years. From 1 January 2026, access to these boards was extended to include micro, small and medium-sized enterprises (SMEs) buying goods or services as ‘end users’. This provides SMEs with a free, settlement-focused legal avenue.

[38] Figure 22, 2026 EU Justice Scoreboard. The income threshold for legal aid in Hungary is the lowest in all European Union countries. Hungary provides free legal aid (legal counsel) for people with a monthly maximum income of HUF 28 500 (EUR 80) per person as a general rule.

[39] INFR(2025)2163. The Commission found that in Hungary, not all persons covered by EU rules have access to legal aid. Also, the granting of legal aid depends on a request by the individual. Additionally, while Hungary applies a system of mandatory defence, this system does not cover all scenarios set out by EU law, and it does not ensure that legal aid is granted without undue delay.

[40] The generally applicable fee remained HUF 7 000 (around EUR 20) per hour (see Section 67(4) of Act LXIX of 2025 on the annual budget of 2026). As of February 2026, a new hourly fee applicable during the criminal investigation was introduced and set at HUF 11 000 (around EUR 31) (see Section 7(1a) of Decree 32/2017 of 27 December 2017 of the Minister of Justice, amended by Decree 3/2026 of 30 January 2026).

[41] Amnesty International Hungary et al. (2026), p. 22; Hungarian Helsinki Committee (2026), p. 19.

[42] 2025 Rule of Law Report, Hungary, p. 9. Figure 27, 2025 EU Justice Scoreboard. Hungary ranks 25[th] among EU Member States.

[43] Figure 47, 2026 EU Justice Scoreboard.

[44] Amnesty International Hungary et al. (2026), pp. 27-28.

125 days in 2023 to 131 days in 2024) yet remaining amongst the shortest in the EU. On 19 August 2025, new provisions of the Civil Procedure Code entered into force introducing simplified rules for certain proceedings[45].

While a compensation scheme has been introduced for contentious civil and administrative proceedings, there is still no adequate scheme for cases involving protracted criminal and non-contentious civil proceedings. The compensation scheme introduced in civil lawsuits as of 1 January 2022 was found satisfactory by the European Court of Human Rights in 2023[46]. A 2025 amendment to the procedural rules applicable to contentious civil and, as of 1 July 2026, administrative proceedings introduce an additional compensation scheme[47]. The new rules oblige the court itself to pay the parties *ex officio* a daily lump sum as compensation for any procedural deadline breached by the judge hearing the case[48]. Stakeholders have expressed concerns as regards this new compensation scheme introduced on top of the existing one[49]. In the context of the enhanced supervision of the implementation of the *Gazsó* judgment of the European Court of Human Rights, on 11 March 2026 the Committee of Ministers of the Council of Europe reiterated its grave 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'[50].

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 2025 Corruption Perceptions Index by Transparency International, Hungary scores 40/100[51] and ranks 26th in the EU and 84th globally. This perception has been relatively stable over the past five years[52]. The 2025 Special Eurobarometer on Corruption shows that 83% of respondents consider corruption widespread in their country (EU average 71%) and 35% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 88% of companies consider that corruption is widespread (EU average 65%) and 56% consider that corruption is a problem when doing business (EU average 37%). Furthermore, 43% of respondents find that there are enough successful prosecutions to deter people from corrupt

45 Act XLIX of 2025 introducing Sections 591/A to 591/H to the Civil Procedure Code. With a few exceptions where the rules of the simplified proceedings do not apply (e.g. disputes on personal status, employment relationships, and consumer disputes), the parties themselves may decide to stipulate in their contract that their legal dispute shall be decided by the court in this procedure. In the simplified proceedings, thanks to specific rules, the court delivers its judgment within a short period of time, based on written pleadings or additional written submissions and evidence. Hungarian Government (2026), written input, p. 13.

46 ECtHR judgment in *Szaxon v Hungary*, application no. 54421/21, 30 March 2023. The amount of pecuniary satisfaction is HUF 400 (around EUR 1.1) per day.

47 Act XLIX of 2025.

48 Hungarian Government (2026), written input, p. 13. The amount of the daily lump sum is currently HUF 4 842 (around EUR 14).

49 According to stakeholders, these new rules may allow court managers to put judges under undue pressure (Amnesty International Hungary et al. (2026), p. 24. See also MEDEL (2026), p. 10).

50 CM/Del/Dec(2026)1553/H46-23.

51 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).

52 In 2021, the score was 43, while, in 2025, the score is 40. 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.

practices (EU average 38%), while 13% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 31%)[53].

Work is advancing to remedy the previously identified systemic breaches to the principles of the rule of law. To protect the EU budget against corruption and systemic breaches to the principles of the rule of law, in 2022 the Council partially suspended funds under three EU cohesion policy programmes and prohibited entering into new legal commitments with public interest trusts (PITs) and entities maintained by them, until the breaches of the principles of the rule of law and/or their effects or risks for the Union budget or the Union's financial interests are remedied[54]. On 23 June 2026, the National Assembly adopted an omnibus law which seeks to increase transparency and strengthen the anti-corruption framework[55]. These legislative amendments aim to reinforce the powers of the Integrity Authority and ensure that it has access to data necessary for carrying out its work, address conflicts of interest and transparency concerns related to the operation of PITs pending their dissolution, extend judicial review of the decisions of investigative authorities and the prosecution service, increase the transparency of beneficial owner data of private equity funds, as well as increase the transparency of public procurement data and strengthen public procurement rules to facilitate competition and the prevention of corruption and conflict of interest. By delivering on the commitments undertaken in the milestones linked to the rule of law in its Recovery and Resilience Plan, Hungary aims to also take the necessary remedial measures for the lifting of the measures under the Conditionality Regulation procedure[56].

The timeline for implementing the 2024-2025 National Anti-Corruption Strategy and related Action Plan ended in November 2025andcertain actions remain pending. The former Government reported that out of 81 sub-measures defined in the Action Plan, 48 had been completed, while 33 are ongoing, partially implemented or contingent upon the completion of ongoing activities[57]. An independent evaluation of the implementation of the Strategy was completed in February 2026. Important outstanding actions relate to strengthening the transparency of political party financing, reinforcing integrity of members of Parliament and high-level officials through codes of conduct and training, as well as the adoption of legislation on lobbying. Completed actions mainly concern measures such as risk analysis in government offices, the provision of ethics and integrity training to judges, prosecutors, police staff and civil servants, a review of the Code of Ethics of the Police, the provision of trainings on whistleblower protection and preparation of methodological guidance[58]. A decision on the preparation of a follow-up Strategy is yet to be taken[59].

The omnibus law of June 2026 aims to tackle obstacles to the effective functioning of the Integrity Authority. The Integrity Authority (IA) continued to report insufficient access to

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[53] Data from Special Eurobarometer 561 (2025) and Flash Eurobarometer 557 (2025).
[54] Council Implementing Decision (EU) 2022/2506 of 15 December 2022.
[55] Act XVIII of 2026 on the amendment of certain Acts necessary for accessing European Union funds.
[56] The assessments included in this country chapter do not prejudge 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.
[57] Information based on data available in the Monitoring Matrix for Q4 2025. Hungarian Government (2026), written input, p. 21. The deadline for implementation of the Strategy was set at 30 November 2025.
[58] Monitoring Matrix.
[59] Hungarian Government (2026), written input, pp. 21-22. Two evaluation reports are also under preparation as regards the implementation of the 2024 Strategy against Fraud and Corruption involving EU Funds.

the databases needed for the full execution of its mandate[60]. To address this issue, the omnibus law of June 2026 aims to strengthen the IA's access to data in the context of administrative investigations and asset declaration verification procedures[61]. Amendments to the appointment process and governance of the IA seek to further strengthen its independence. For any future appointment, the eligibility committee is tasked to draw up a ranking of candidates, from which the President of the State Audit Office, as the appointing authority, may depart only exceptionally and in duly justified cases[62]. Moreover, a new governance structure of the IA is established, consisting of a five-member board composed of the President and four Vice-Presidents[63]. On 16 June 2026, the President of the State Audit Office petitioned the Budapest Regional Court to remove the President of the IA from office, following an indictment against him for abuse of office and forgery of official documents[64]. As regards the follow-up to the IA's recommendations, the former Government agreed or partially agreed with ten of the 42 recommendations made by the IA in its third analytical integrity report, disagreed with 17 and considered that no further action was needed on the remaining 15[65]. In 2025, the IA referred four cases to the prosecution service[66]. In July 2025, the eligibility committee published its report on the functioning of the IA with recommendations, including amendments to the IA's internal rules[67]. The IA committed to examining the possibility of their implementation, while it criticised the methodology, as well as supporting evidence for the conclusions.

The omnibus law of June 2026 also aims to strengthen the functioning and impact of the Anti-Corruption Task Force. The Anti-Corruption Task Force (ACTF) held eight meetings in 2025 and adopted its 2025 annual report in March 2026[68]. Non-governmental members of the ACTF remained concerned about an overall lack of impact of its work and a limited uptake of its proposals by the previous government[69]. The ACTF failed to adopt its annual report in spring 2025 due to lack of consensus, which prevented it from addressing its

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60 Country visit Hungary, Integrity Authority. The IA's latest annual report to Parliament refers specifically to the personal income tax and beneficial owner databases; the Integrated Portal-based Query System (IPL), ensuring access to the registers managed by Ministry of Interior's Deputy State Secretariat for the Management of Registers; data provision by financial institutions maintaining accounts; civil status data to identify relatives; company registry; the Prime Minister's Office's Electronic Public Procurement System, the public procurement database and EUPR (System of European Union Programmes) database; the Hungarian State Treasury's Integrated Administration and Control System (IACS) insolvency registers.

61 Such access may be ensured upon request or through direct data connection. The legislation also obliges data controllers to comply with the Authority's request for data and in case they fail to do so, it envisages that the Integrity Authority may bring an administrative non-compliance action.

62 Section 35(2) of the Integrity Authority Act.

63 Section 32(1) of the Integrity Authority Act. Furthermore, the amended Section 34(2) of that Act defines the decision-making powers of the Board of the Authority, alongside those of the President.

64 According to the State Audit Office, these charges would disqualify the IA President from holding the position. News item of the prosecution service of 9 June 2026. 24.hu (2026). Stakeholders expressed concerns that the uncertainty due to the fourteen-month-long investigation may have negatively impacted the effective functioning of the IA. Amnesty International Hungary et al. (2026), p. 54.

65 The recommendations concern proposals affecting the operation of the institutional system responsible for monitoring EU funds, market concentration analysis, enhancing competition in public procurement (anti-competitive solutions / single-bidder procedures / sham bidding) and centralised public procurement. Integrity Authority (2025). This marks a substantial decrease compared with the uptake of recommendations in the second annual analytical integrity report. See 2025 Rule of Law Report, Hungary, p. 12.

66 Country visit Hungary, Integrity Authority.

67 In line with the Integrity Authority Act, the functioning of the IA and its board is subject to a review two years after the appointment of the members of the board.

68 ACTF (2026).

69 Amnesty International Hungary et al. (2026), pp.38-39. See also ACTF (2026).

proposals to the Government[70]. To avoid a similar situation, in September 2025, the ACTF revised its rules of procedure whereby the ACTF will produce shorter, focused thematic reports which will form part of the annual report[71]. The omnibus law of June 2026 sets a five-year term for the members of the ACTF, establishes a right to remuneration for the members representing non-governmental actors, and empowers the ACTF to establish its own rules of procedure and annual work plan.

The number of accepted motions for revision of decisions of investigative authorities remained stable compared to the previous year. In 2025, 85 motions for a revision of a decision not to investigate corruption suspicions or terminate ongoing investigations were submitted to the Buda Central District Court. The court upheld the motion for revision in seven cases, annulling the decision of the investigating authority, and rejected or terminated the procedure in 71 cases, with seven cases still pending as of 31 December 2025[72]. Between 1 January 2023 and 30 June 2025, the prosecution service granted 58 motions on its own authority[73]. According to some CSOs, law enforcement bodies have been inclined to interpret the law in a restrictive manner to justify dismissals and avoid the filing of motions, thereby preventing the court from ordering the continuation of a previously dismissed or closed investigation[74]. The omnibus law of June 2026 strengthens the procedure by extending its scope of application to (non-time-barred) criminal offences committed before 1 January 2023 and by giving greater weight to the court's decisions[75]. Moreover, the law reinforces the role of the IA in the procedure by enabling it to review the original decision and request access to the criminal proceeding files[76]. No private prosecution has been initiated so far[77].

Lifestyle checks and integrity tests as regards 'protected staff' remain in use with the extensive use of secret surveillance and insufficient safeguards raising concerns with regard to the right to privacy, while no information is available about checks of high-level officials. The powers of the National Protective Service (NPS), responsible for carrying out integrity tests and lifestyle monitoring, have been extended to allow for the use of covert means in cases of active bribery and abuse of function, as well as the use of polygraph testing in the context of such activities[78]. The prosecution service reported that this had led to an increased rate of detections and indictments as regards protected staff[79]. At the same time, a

70 According to the Integrity Authority Act, the ACTF must adopt its annual report by 15 March of the year following the year in question. The Government is then required to discuss the conclusions and proposals made in it and send a detailed reasoning to the chair of the ACTF, if it decides not to implement a proposal. In the absence an adopted report for 2024, due to disagreement between state and non-governmental members, this did not occur.

71 Hungarian Government (2026), written input, pp. 19-20. Amnesty International Hungary et al. (2026), pp. 38-39. Permanent sub-groups will be replaced by *ad hoc* expert committees. The first thematic report will cover education and awareness-raising to prevent corruption, whereas public procurement processes, prosecution of corruption and access to information will not be covered.

72 Hungarian Government (2026), written input, p. 37. In 2024, 80 cases were received, of which 7 motions for revision were upheld.

73 Hungarian Government (2026), written input, p. 36.

74 Amnesty International Hungary et al. (2026), p. 51. See also K-Monitor (2025).

75 The new provisions require the investigative authorities concerned to make efforts to eliminate the deficiencies identified by the court and to effectively remedy them.

76 Prior to the amendments, the IA could only access an anonymised decision of the investigative authorities.

77 Hungarian Government (2026), written input, p. 36. See 2023 Rule of Law Report, Hungary, p. 13.

78 Hungarian Government (2026), written input, p. 16. Section 182 of Act XLIX of 2025, as well as Section 3 of Government Decree 388/2025 of 10 December 2025 on the Amendment of Government Decrees concerning criminal law matters.

79 Country visit Hungary, prosecution service. 'Protected staff' covers the range of bodies and personnel for which the NPS is competent. It includes law enforcement, public education and state healthcare institutions,

judgment of European Court of Human Rights found that the indiscriminate use of secret surveillance and the lack of effective safeguards raised concerns as regards privacy[80]. The NPS has further expanded and upgraded its technical equipment. It has continued its training and awareness-raising activities among certain categories of 'protected staff'[81]. There is still no publicly available statistical data on the reliability tests or national security vetting conducted by the Constitution Protection Office, responsible for carrying out checks as regards high-ranking officials, given the confidentiality of its activities[82].

Whereas the number of indictments for corruption-related crimes has generally increased, there has been overall no progress on the recommendation to establish a robust track record in cases of high-level corruption[83]. The prosecution service reports a 43% increase in the number of indictments for corruption offences overall. The former Government reported that these improved indicators may be attributed to the targeted activities of the NPS and to the level of specialisation of the Central Chief Prosecution Office of Investigation, which has an exclusive jurisdiction in investigating corruption offences[84]. In 2025, 380 persons received a final conviction for corruption crimes[85]. High-level corruption cases have been pending before the first-instance courts for years[86]. The risk of political influence and undue interference in individual cases within the prosecution service and the police, as well as clientelism, favouritism and nepotism in high-level public administration remain areas of concern[87]. In June 2026, the new Government submitted a draft constitutional amendment ('the Seventeenth Amendment') and a draft law setting up a National Asset Recovery and Protection Office ('NARPO') for public consultation. The Seventeenth Amendment was adopted by the National Assembly on 13 July 2026 and is yet to be promulgated. The NARPO is planned to be an independent agency combining a significant number of competences, including financial analysis, public asset-focused investigations, law enforcement, prosecution and litigation[88]. The former Government reported good cooperation between the prosecution service and OLAF, with investigations initiated in all cases where

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employees of territorial government administration bodies and several other authorities. See Hungarian Government (2026), written input, p.15.

80 Judgment of the ECtHR, 15147/23 and 38303/23, *Szelényi and Others v Hungary*. See pillar IV.

81 Hungarian Government (2026), written input, pp. 22-23. With regard to the National Tax and Customs Administration, the program is currently being developed (in collaboration with the relevant departments).

82 Country visit, Hungary, Constitution Protection Office. Reliability checks by the Constitution Protection Office are carried out on the basis of a classified authorisation decision.

83 The 2025 Rule of Law Report recommended that Hungary '[e]stablish a robust track record of investigations, prosecutions and final judgments for high-level corruption cases.' No progress was previously assessed on this recommendation in 2025, 2024 and 2023.

84 Hungarian Government (2026), written input, p. 37.

85 Country visit, Hungary, written contribution from the prosecution service.

86 In a case involving a former deputy mayor, charged in 2010, the criminal trial began in 2016, and the final binding sentence was delivered in 2025 but was not enforced. See Amnesty International Hungary et al. (2026), pp. 50-51. See wanted notice issued by the Budapest Regional Court - 7.SZV.2638/2025/11. In the case of a former Deputy Minister of Justice, indicted in 2022, or the budgetary fraud case of a former member of Parliament, initiated in 2021, the courts have so far not reached a first-instance deliberation on the merits. The case of a Deputy Secretary of State, indicted in 2022, is also pending in court. Country visit, Hungary, written contribution from the prosecution service. See also OLAF (2026). Stakeholders raise concerns that in a recent case of misappropriation of assets held by foundations endowed by the Hungarian National Bank, key procedural steps, including interrogation of suspects, are still to be taken (Amnesty International Hungary et al. (2026), pp. 36, 53-54).

87 See 2025 Rule of Law report, Hungary, p. 15. 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. See also the reference to risks of undue political interference in individual cases on pp. 4-5. See K-Monitor (2025).

88 T/357.

judicial recommendations were sent by OLAF[89]. On 29 May 2026, Hungary notified its intention to participate in the enhanced cooperation on the European Public Prosecutor's Office (EPPO) and the Commission subsequently adopted a decision confirming Hungary's participation[90]. The positive changes recently initiated in the anti-corruption framework have not yet come into effect and therefore no progress has yet been made on establishing a robust track record of investigations, prosecutions and final judgments for high-level corruption cases.

Legislative amendments have strengthened the framework for liability of legal persons, in line with international recommendations related to foreign bribery. The amendments eliminate the regulatory gap between active bribery in the public and private sectors, strengthen corporate liability and introduce a new three-tiered time limit system for investigations[91]. In December 2025, the former Government introduced provisions requiring Hungarian companies that apply for non-refundable state aid for foreign investments to possess a verified anti-corruption strategy addressing specifically foreign bribery risks[92]. Cooperation between the National Tax and Customs Administration and the Prosecutor General's Office has been formalised through a new agreement to enhance information sharing and crime reporting[93]. An international experience-sharing training session on international corruption cases was held in January 2026 for prosecutors[94].

New legislation aims to improve the system of asset declarations, providing for effective oversight and enforcement[95]. The omnibus law of June 2026 establishes a comprehensive system of asset declarations applicable to a broad range of public officials and their relatives, including senior political executives and high-risk officials such as members of Parliament, the President of the Republic, heads of key regulatory authorities, local government representatives, judges, prosecutors, as well as other high-ranking civil servants. The scope of assets to be declared now includes the declarant's primary residence. Furthermore, the asset declarations of members of Parliament and senior political executives must be submitted in electronic format and stored in a digital register maintained by the National Assembly. They are to be made public on the website of the National Assembly. The IA is granted exclusive powers for the verification of asset declarations of senior political executives, whereas for other categories of public officials its powers are shared with other competent bodies[96]. The law also sets out a system of administrative and criminal sanctions for different types of violations of asset declaration obligations, including failure to submit an asset declaration or intentionally providing false data. Administrative sanctions proportionate to the gravity of the

89 The indictment rate of Hungary following judicial recommendations by OLAF stands at 60% (EU average 37%). OLAF (2026).
90 Commission Decision (EU) 2026/1701 of 10 July 2026 confirming the participation of Hungary in the enhanced cooperation on the establishment of the European Public Prosecutor's Office. The EPPO will be competent to investigate and prosecute crimes affecting the Union's financial interests committed in Hungary after 1 June 2021.
91 Hungarian Government (2026), written input, pp. 34-35. Act XLIX of 2025.
92 Decree 12/2025 (IX. 25.) of the Minister of Foreign Affairs and Trade amending Decree 31/2021 (VIII. 31.) of the Minister of Foreign Affairs and Trade on the rules of support under the Foreign Market Growth Support Program.
93 Country visit Hungary, prosecution service.
94 Monitoring Matrix. It was originally planned to take place by 31 December 2024.
95 The 2025 Rule of Law Report recommended that Hungary '[…] further improve the system of asset declarations, providing for effective oversight and enforcement'.
96 Senior political executives are listed in Section 183 of Government Administration Act and include the Prime Minister, Ministers, Secretaries of State, the political director of the Prime Minister and the national security adviser of the Prime Minister.

violation, including a fine or dismissal, may be imposed by the IA or by other competent bodies, depending on the legal status of the declarant[97]. The omnibus law of June 2026 also expands the definition of beneficial owner and broadens third-party access to the beneficial ownership register[98]. Since legislation was adopted to improve the asset declaration system, including oversight and enforcement, this part of the recommendation has been fully implemented.

There has been no progress yet on the recommendation to adopt comprehensive legislative reforms on lobbying and revolving doors[99]. Despite plans to adopt comprehensive legislation on lobbying by 30 November 2025, no steps have yet been taken in this regard[100]. CSOs stress that the lack of transparency leaves the legislative process vulnerable to undue external influence[101]. The absence of post-employment restrictions and of an effective enforcement mechanism also remains a concern[102]. In this regard, stakeholders signal that senior officials frequently transition between the executive, the legislature, and independent oversight bodies without cooling-off periods or substantive conflict-of-interest assessments[103]. Since no steps have been taken for a comprehensive reform on lobbying and post-employment rules, there has been no progress on this part of the recommendation.

Steps have been taken to address conflicts of interest in the governance structures of public interest trusts and non-binding measures on conflicts of interests have been adopted in certain sectors. In line with the Sixteenth Amendment to the Fundamental Law, the omnibus law of June 2026 provides for the dissolution of public interest trusts (PITs)[104]. PITs not maintaining a higher education institution in Hungary must be dissolved by 31 August 2026, while higher education PITs must be dissolved by 1 August 2027. Pending dissolution, board members and executive officers, including incumbent ones, must meet strict integrity requirements. These include appointment via an open call, eligibility criteria, incompatibility rules, and a four-year mandate limitation. Moreover, they would be subject to independent vetting by the State Audit Office and verification of their asset and interest declarations by the IA. Following the adoption of a Code of Ethics and Conduct for civil servants of the Office of the National Assembly in 2024, an integrity awareness-raising training programme and assessment questionnaire have been developed[105]. No dedicated codes of ethics have been drafted for members of Parliament and persons in top executive functions, as recommended by GRECO[106]. There are no rules in place regarding situations of

97 Where the IA may not impose a sanction itself, a competent authority that does not act on the findings of the IA is required to provide a detailed statement of reasons, which must be published.

98 These legislative changes increase transparency of ultimate beneficial owners of private equity funds, facilitating the detection of unjustified wealth. See also see 2025 Rule of Law Report, Hungary, p.16.

99 The 2025 Rule of Law Report recommended that Hungary '[p]ut forward comprehensive legislative reforms on lobbying and revolving doors'. No progress was previously assessed on this recommendation in 2025, 2024 and 2023.

100 The adoption of rules on lobbying has also been recommended by GRECO. See GRECO (2023), p. 3 and GRECO (2022), p. 56.

101 Country visit Hungary, CSOs.

102 The adoption of rules on post-employment restrictions has also been recommended by GRECO. See GRECO (2023), p. 57.

103 Amnesty International Hungary et al. (2026), p. 42. This includes, for instance, a former Minister of Finance transitioning directly to a position as President of the Hungarian National Bank.

104 Until the dissolutions are completed, full founder's rights revert to the Hungarian government. Assets granted to the dissolved foundations are to be returned to the state.

105 Hungarian Government (2026), written input, p. 24.

106 Under the fourth evaluation round, GRECO recommended that a code of ethics/conduct for members of parliament be adopted, covering various situations of conflicts of interest and that it be complemented by practical measures for its implementation, such as dedicated training and counselling. GRECO (2023).

personal conflicts of interest of members of Parliament. In 2025, no incompatibility and conflicts of interest proceedings were initiated for members of Parliament[107]. The Hungarian Corps of Government Officials approved a revised Code of Professional Ethics on 10 July 2025, including rules on avoiding conflicts of interest and managing interactions with lobbyists[108]. In November 2025, the NOJ President, with the consent of the National Judicial Council, updated the integrity rules to be followed in the event of judges accepting gifts[109]. Previously identified weaknesses, such as the fragmentation of the legislative framework on conflicts of interest, the lack of a general definition of conflicts of interest and the absence of a central supervisory body, remain to be addressed.

The framework for the protection of whistleblowers is in place, however, the existence of different regimes for whistleblower reporting risks weakening protection. The Commissioner for Fundamental Rights continues to oversee the national whistleblowing regime[110]. In 2024, submissions to the Commissioner's protected electronic system rose by 16% but the vast majority did not concern corruption[111]. The Office of the Commissioner submitted its first comprehensive data report under the Whistleblowing Act, in the standard format prescribed by the European Commission, by the statutory deadline of 31 March 2025. Disclosures may be submitted anonymously, their status can be tracked online, and anonymised extracts of reports and their outcomes are published on the Office's website[112]. Whistleblower reports have proven a more effective tool in specific regulated areas, as 43% of reports submitted to the Public Procurement Authority led to the initiation of contract audits and remedy procedures before the Arbitration Board, and 11% of submissions to the Competition Authority resulted in the launch of formal competition law infringement proceedings[113]. An information-sharing exercise on whistleblowing targeting the business sector was implemented in partnership with the Hungarian Chamber of Commerce and Industry[114]. CSOs continue to express concerns that the separate regime for reports falling outside the Directive's scope leaves potential whistleblowers with no or very weak protection and that whistleblower reports disclosed to the media are still left without protection[115].

Shortcomings related to the transparency of the financing of political parties and electoral campaigns remain. In June 2025, legislative amendments resulted in the abolition of Hungary's long-standing legal limit on campaign spending for parliamentary elections[116].

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107 Hungarian Government (2026), written input, p. 25. In 2025, fourteen members of Parliament voluntarily corrected information in their declarations by clarifying the positions they held. There is no mechanism in place to sanction refusals to rectify the declarations, if discrepancies are signalled or detected.

108 Hungarian Corps of Government Officials (2025).

109 Recommendation 2/2025 (XI. 5.) OBH of the NOJ President amending Recommendation 3/2018 (VI. 26.) OBH of the NOJ President on the procedural rules for handling events that violate organisational integrity for regional appeal courts and regional courts.

110 See pillar IV on the independence and effective functioning of the Commissioner for Fundamental Rights.

111 Commissioner for Fundamental Rights (2025).

112 Hungarian Government (2026), additional written input.

113 Public Procurement Authority: Register of Public Interest Disclosures. Hungarian Competition Authority (2025).

114 Hungarian Government (2026), written input, p. 26. The broad public campaign on whistleblowing included in the National Anti-Corruption Strategy did not take place. The Office of the Commissioner for Fundamental Rights also prepared a phased training campaign for public administration staff and provides detailed information through its website, informational booklets, and regional offices.

115 Amnesty International Hungary et al. (2026), pp. 46-47. Media informants are protected under the Criminal Procedure Code and the Media Act. Hungarian Government (2026), additional written input.

116 Act LXVIII of 2025 on the amendment of Act LXXXVII of 2013 on the transparency of campaign costs for the election of Members of Parliament. The Council of Europe has recommended adopting measures to

Challenges previously identified regarding political party and campaign financing rules have not been addressed in the reporting period[117]. Stakeholders reported that state-funded information or national consultation initiatives were used as a tool of electoral campaigning and that the involvement of third-party actors undermined the transparency of campaign financing[118]. A legislative amendment adopted in December 2025 aims to sanction 'proxy' campaigning, meaning activities indistinguishable from a party's image or conducted under a party's direction, only when it is financed, even in part, by foreign sources[119]. Political parties continue to submit their annual accounts as required. However, the accessibility and searchability of reports published in the Official Gazette is limited. Moreover, information on the results of audits, including any breaches identified, investigations conducted, or sanctions applied, is not systematically made available[120]. In June 2026, a legislative amendment was adopted under which parliamentary groups can no longer transfer their budget surpluses for the current year to political parties[121]. Overall, concerns therefore remain as regards the transparency of political party and campaign financing.

The omnibus law of June 2026 addresses corruption risks in public procurement procedures and increases the transparency of private equity funds. Businesses' attitudes towards corruption in the EU show that 48% of companies in Hungary (EU average 30%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years[122]. Only 17% of businesses perceive the level of independence of the public procurement review body (Public Procurement Arbitration Board) as very or fairly good[123]. The Single Market and Competitiveness Scoreboard on access to public procurement in Hungary reports 24% of single bids for 2025 (EU average 27%)[124]. At the same time, the share by contract value of single-bid public procurements conducted under national rules or financed from national resources has increased[125]. The omnibus law of June 2026 strengthens the transparency of public procurement procedures and provides for the possible inclusion of anti-corruption conditions in procurement contracts. It also enables the IA to initiate proceedings before the Public Procurement Arbitration Board and to bring actions for failure to act against it. In particular, the law clarifies the IA's power to act in respect of defence and security procurements and to

prevent excessive funding needs of political parties, such as, establishing limits on expenditure on electoral campaigns. See Article 9 of Recommendation Rec(2003)4 of the Committee of Ministers.

117 See 2025 Rule of Law Report, Hungary, p. 18.

118 Amnesty International Hungary et al. (2026), pp. 43-44. See also 2020 Rule of Law Report, Hungary, p. 5 as regards national consultations.

119 Act C of 2025 amending laws affecting the financial intermediary system.

120 OECD (2026).

121 Act XVII of 2026 on the amendment of Act XXXVI of 2012 on the National Assembly and certain related Acts concerning cost reduction.

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

123 Figure 59, 2026 EU Justice Scoreboard.

124 This trend is mixed however as the share of public procurement procedures with single bids decreased for both EU-financed and national procurements until 2024, in 2025, the share of EU-funded single bid procedures doubled compared to 2024 (increased to 9.5% from 4.2% in 2024). In addition, the target committed to by Hungary for domestically financed public procurements was not met for the third consecutive year: in 2023 it was 29% vs the target of 24%, in 2024 it was 22.3% vs the target of 15% and in 2025 it was 22% vs the target of 15%. According to the new Government, this figure applies only to procedures conducted under EU rules. If procedures conducted under national rules are included, the proportion is below 20%. Hungary has fulfilled its commitment to reduce the proportion of single-bid public procurements to below 15% for procedures financed at least in part by EU funds; this proportion now stands at 9.5%. Hungarian Government (2026), additional input.

125 Analysis of single-bid public procurements 2021-2025 (13 February 2026)

challenge an exclusion from public procurement rules based on national security grounds. Important constraints to competition in the public procurement market remain[126]. Stakeholders also report that competition in public procurement has not improved in practice, as the largest tenders continue to be won by a limited number of economic actors[127]. In addition, the share and volume of framework agreements rose substantially[128]. These may limit competition, as a vast majority are concluded with one single market participant[129]. The share of private equity funds involved in public procurement increased (5% in case of all procurement and over 9% in case of EU-funded procurements). In order to address risks of corruption and conflicts of interest associated with private equity funds, the omnibus law of June 2026 establishes stricter transparency and due diligence requirements[130]. EU rules on public procurement and concessions have not been respected in high-value projects related to motorways[131] and waste management[132]. In 2025, the visibility of notices, guidance and other documents on public procurement in the Electronic Public Procurement System was improved, and the indicators of the performance measurement framework were refined further[133]. State administrative bodies have assessed the integrity and corruption risks related to their operations. The most common types of corruption risk relate to administrative and regulatory proceedings, customer relations and data management activities[134]. Other areas exposed to corruption risks include official licensing and official inspection[135]. As regards regimes for issuing of official permits, the designation of projects as being of 'strategic

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[126] The IA reports increasing market concentration, especially related to companies belonging to the same ownership structures (over 40% for the top 10 companies); when EU-funding is involved, and in certain sectors (concentration is over 50% in business services and IT services). Also, it underlines that the improving trend of single bids may conceal the existence of 'supporting bids' and would require more targeted analysis. Integrity Authority (2025).

[127] Amnesty International Hungary et al. (2026), pp. 48-49. See also Transparency International Hungary's Tender Champion database according to which companies linked to a close friend of the former Prime Minister has won public procurement contracts worth a total of more than EUR 2.6 billion, amounting to 8.6% of the total value of the tenders examined for the period between 2021and 2023.

[128] In 2025, their value exceeded that of all other tenders (ca. 60%) and close to 75% of them was concluded with a single bidder. The most notable example of this is the commissioning of PR and communication services by a central purchasing body. The Government does not include framework agreements in statistics on single bids in line with the Single Market Scoreboard methodology.

[129] In 2024, 74% of framework agreements did not reopen competition, as they were concluded with only one economic operator. See Performance measurement framework for evaluating the efficiency and cost-effectiveness of public procurement, indicator n47. One example is the communication sector where companies owned by one person won 74% of contracts between 2021 and 2023. Corruption Research Centre Budapest (2024).

[130] The new rules extend the definition of ultimate beneficial owners to capture all natural persons who exercise *de facto* control or hold blocking voting rights and make mandatory the identification of ownership chains established through parallel funds, holding structures or multi-jurisdictional arrangements.

[131] On 17 July 2025, the Commission sent an additional letter of formal notice to Hungary for failing to comply with EU rules on public procurement and concessions when awarding a contract for the construction, operation and maintenance of its motorway network (INFR(2024)4006).

[132] On 21 November 2025, the Commission opened an infringement procedure against Hungary for failing to comply with EU rules when awarding its waste management concession for the entire territory of the country (INFR(2025)4020). The Commission considers that the eligibility criteria applied in this procedure were discriminatory and that the 35-year duration of the concession exceeds the period permitted under EU law. In addition, the original terms of the concession appear to have been modified in breach of EU rules.

[133] Hungarian Government (2026), written input, pp. 38-39. The Action Plan on increasing competition has also been supplemented with further measures in 2025.

[134] Hungarian Government (2026), written input, pp. 22-24.

[135] Hungarian Government (2026), written input, p. 31.

importance for the national economy' allows to circumvent standard procedures[136]. This increases the opacity of the permitting process and accordingly corruption risks.

III. MEDIA PLURALISM AND MEDIA FREEDOM

Amendments to the Media Act have introduced reforms to the Hungarian media regulator[137]. By means of an Act, adopted in June 2026, which amends the 2010 Media Act and other related acts[138], the term of office of the President and members of the Media Council have been terminated. The legislation introduces new rules in relation to the competences, tasks and roles of the Media Authority, its Media Council, its President, Vice-Presidents and its Office, and establishes new criteria for the nomination, appointment and dismissal of all relevant office holders within these structures. Furthermore, the new rules reform the rules regulating the salaries of these office holders and the financing regime of the Media Authority. Prior to the adoption of these reforms, the 2026 Media Pluralism Monitor (MPM) considered that the indicator relating to the independence and effectiveness of the Media Authority was an area presenting high risk[139]. On 26 February 2026, the Court of Justice ruled that certain provisions of Hungary's media law and the decision of the media regulator based thereon refusing renewal of radio station *Klubrádió*'s broadcasting licence, had failed to observe the principles of proportionality, transparency and good administration and had infringed freedom of expression and information enshrined in the EU Charter of Fundamental Rights[140]. In the light of the legislative steps taken with a view to implement the European Media Freedom Act, some progress has been made in this area.

Transparency and fairness in the distribution of state advertising has not been addressed yet[141]. Hungary has not adopted any legislative or regulatory measures aimed at ensuring that state advertising is allocated in accordance with transparent, objective, proportionate and non-discriminatory criteria made publicly available in advance. During the reporting period, the State remained by far the most important player in the media advertising market, channelling significant state resources to pro-government media and increasing its spending. As in the previous year, stakeholder media monitoring reports that state advertising accounts for over 30% of the total advertising market and the Central European Press and Media Foundation (KESMA), a group of pro-government media outlets receives up to 75%-80% of its total revenue from state advertising[142]. The 2026 MPM confirms its previous analysis given that 'the unfair distribution of state advertising, including advertising from state-owned companies, still prevails'[143]. Given that no measures have been taken to improve fairness in the distribution of state advertising, there has been no progress yet as regards the recommendations made in previous years.

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136 Such projects are exempted from regular requirements and safeguards in order to simplify and accelerate investment procedures (2023 Rule of Law Report, Hungary, p. 19).

137 The 2025 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'. No progress was previously assessed on this recommendation in 2025, 2024 and 2023.

138 Act XXI of 2026.

139 Media Pluralism Monitor (2026), pp. 15-18.

140 Judgment of the CJEU, case C-92/23, *Commission v Hungary (Right to provide media services on a radio frequency).*

141 The 2025 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'. No progress was previously assessed on this recommendation in 2025, 2024 and 2023.

142 Mertek Media Monitor (2026), International Press Institute (2026) and Reporters Without Borders (2026).

143 Media Pluralism Monitor (2026), pp. 33-34.

Transparency in the ownership structure of media companies is not regulated by specific provisions. Section 41 of the Media Act mandates the NMHH to maintain registers on media service providers, but these registers contain no information on ownership or beneficial ownership of these companies. Direct ownership information is available via the business register. MPM 2026 has raised its risk level for this area from high to very high-risk given that ‘there are no detailed transparency rules requiring the disclosure of media companies’ ownership structures’ and ‘neither the direct nor the indirect ownership background of media service providers is included’[144].

Amendments to the Media Act have introduced reforms to the system regulating public service media supervision, regulation and financing[145]. On 11 December 2025, the European Commission opened an infringement procedure[146] against Hungary for failing to comply with several provisions under the European Media Freedom Act[147] and certain requirements under the Audiovisual Media Services Directive[148], including the provisions on the independence of public service media governance and financing[149]. Prior to the adoption of the amendments to the Media Act, the MPM maintained its very high-risk score for this area highlighting biased coverage, the lack of transparent appointment mechanisms and high levels of political control[150]. The Media Act adopted in June brought about the termination of the previous Public Service Foundation and the establishment of a new Independent Public Media Board and an Office which shall carry out the day-to-day activities on behalf of the former. The legislation establishes new rules regulating the composition of the entities, nominations thereto, conflict of interests, termination of office, as well as the respective tasks, powers and remuneration of these institutions and office holders thereof. It also establishes a new Charter and Civil Service Council for public service media, rules governing the public service provider itself including the appointment of the provider’s CEO, financing and management and new specific employment law rules for this entity. In the light of the legislative steps taken with a view to implement the European Media Freedom Act, some progress has been made in this area.

Although the processing of court cases relating to access to information has been accelerated and new procedural rules may further strengthen the rights of data requestors, the scope of access remains limited, particularly with regard to the use of public funding. The short procedural deadlines introduced in 2023 have led to faster litigation in cases involving access to information of public interest. Most restrictions on freedom of information introduced in 2023, 2024 and 2025 are still in force[151]. Stakeholders report that access to information on the use of public funding via promotional banks and

144 Media Pluralism Monitor (2026), p. 20.
145 The 2025 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’. No progress was previously assessed on this recommendation in 2025, 2024 and 2023.
146 INFR(2025)2194.
147 Regulation (EU) 2024/1083.
148 Directive (EU) 2018/1808.
149 Infringement INFR(2025)2194.
150 Media Pluralism Monitor (2026), pp. 34-36
151 2024 Rule of Law Report, Hungary, pp. 28-29, 2025 Rule of Law Report, Hungary, pp. 21-22. Public bodies are no longer obliged to fulfil requests for information not held directly by them, but by their subordinate entities. Additionally, state-owned enterprises are authorised to keep the data of their foreign investments secret for 10 years, and the government can block some of its decisions for 20 years instead of 10. Also, Act CXXVIII of 2025 introduced a new ground for rejection in the event of cybersecurity concerns.

private equity funds is severely limited[152]. Certain public bodies are reported to allow only on-the-spot examination of documents, which is an unlawful practice[153]. The National Assembly has yet to implement the Constitutional Court's 2020 decision that effective judicial protection must be ensured in cases concerning freedom of information requests relating to public funds addressed to the recipients of such funds[154]. In some instances, case law from both the *Kúria* and the Constitutional Court has validated the lack of judicial review in cases where access to documents is denied on the grounds of foreign policy[155]. Furthermore, the *Kúria* has overturned binding decisions of lower courts and denied access to the requested documents[156]. The omnibus law of June 2026 introduced the requirement of cooperation in good faith between the data requestor and the public service entity[157] and reduced the possibility for public service entities to dismiss requests for access to documents[158]. Stakeholders report that certain public bodies do not comply with enforcement orders granting access to documents[159]. With regard to proactive disclosure, the omnibus law of June 2026 extended the scope of data to be published[160] and the list of entities required to publish information in the Central Public Data Information Register[161]. The Media Pluralism Monitor continues to consider this to be an area presenting very high risk[162].

During a large part of the reporting period, journalists and other media professionals continued to encounter numerous and serious challenges to their work. A wide array of

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152 Transparency International Hungary (2025), pp. 15-19.

153 Under Section 29(3) of the Freedom of Information Act, the applicant is entitled to receive a copy of the documents or document section containing the data, regardless of its mode of storage.

154 Decision 7/2020 (V. 13.) AB of the Constitutional Court found that the right to freedom of information extends to all public data and that judicial remedies must exist to fulfil this fundamental right vis-à-vis all persons handling public data. The legislative measure directly related to this has not been implemented.

155 In a case related to the Budapest–Belgrade railway project, the *Kúria* found that the discretionary decision by the Minister of Foreign Affairs to deny access to information based on foreign policy considerations cannot be reviewed by the court (judgment Pfv.IV.20.100/2022/5, 29 June 2022, confirmed by decision 3200/2025. (VI. 23.) AB of the Constitutional Court).

156 In one case, overturning the lower court judgments, the *Kúria* ruled that access to anonymised invoices issued by a 'VIP ward' of a public hospital could not be granted since they might still contain information that could be used to identify the patients (judgment Pfv.IV.21.030/2025. of the *Kúria* of 17 November 2025). In another case, the *Kúria* overturned the appeal court's ruling and decided that decisions rejecting access to large data sets (in this case, government decisions) could not be challenged in a single lawsuit, but separate claims had to be submitted regarding each element of the sought-after dataset (order IV.Pfv.20.614/2025/8-II. of the *Kúria* of 10 September 2025).

157 Section 26 of the omnibus law of June 2026 introducing Section 26(1a) to the Freedom of Information Act.

158 Section 30 of the omnibus law of June 2026 repealing Section 30(2a) of the Freedom of Information Act. That provision, introduced as of 1 January 2024, provided that public service entities may deny a freedom of information request if granting it would require the collection of data from another public service entity or would require the production of new data by comparing data in possession of the two entities (see 2024 Rule of Law Report, Hungary, p. 29).

159 Amnesty International Hungary et al. (2026), pp. 92-93. The execution of the ECtHR judgment in case *Kenedi v Hungary* is still pending. On 11 June 2026, the Committee of Ministers of the Council of Europe called again on the Hungarian authorities to adopt additional targeted general measures (i) to address the recurring reluctance of state authorities to comply with the domestic courts' orders granting access to documents, and (ii) to ensure that effective and genuinely coercive enforcement tools are available for the implementation of such orders (CM/Del/Dec(2026)1563/H46-17).

160 Section 27(2) and (3) of the omnibus law of June 2026 amending Section 37/C(2) and (3) of the Freedom of Information Act. Under the law, the Register will enable machine readability, bulk download, grouping, searchability, extraction and comparability of data.

161 Section 27(1) of Act of the omnibus law of June 2026 amending Section 37/C(1) of the Freedom of Information Act. The list now also includes public interest trusts and entities maintained by them, publicly owned companies and their foundations and the HUN-REN Hungarian Research Network.

162 Media Pluralism Monitor (2026), p. 14.

stakeholders emphasised that a number of factors had exacerbated the obstacles media workers faced when carrying out their work[163] which a recent report summarised as 'the weaponization of laws against independent media outlets'[164], targeted exclusion of independent journalists[165], the use of smear campaigns against journalists and media outlets, SLAPP lawsuits, the deployment of unlawful surveillance and the actions of the Sovereignty Protection Office[166]. The 2026 MPM considers the safety of journalists to be an area which presented medium-high risk, flagging that surveillance and source protection remained areas of serious concern[167] The Council of Europe's Platform to promote the protection of journalism and safety of journalists registered three new alerts relating to, respectively, continued political influence over public service media, an investigative journalist charged with espionage amid a smear campaign and surveillance concerns and the forced removal of two journalists from a political event[168]. The Mapping Media Freedom monitoring report flagged 24 alerts, relating, among others, to various cases of access being denied to political events or information, political influence and pressure exerted on media outlets, defamation cases lodged by politicians, the use of public funds to target journalists via paid social media adverts and Distributed Denial of Service attacks[169].

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

The former government continued to use its emergency powers extensively until 13 May 2026, undermining legal certainty and affecting businesses' ability to operate in the single market. The former government further extended 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', until 13 May 2026[170]. This allowed the former government to override Acts of Parliament. Several emergency measures adopted in the reporting period had an impact on the business environment and appear unrelated to the 'state of danger'[171]. In 2025, the Constitutional Court did not make any substantive decisions regarding the constitutionality of emergency measures but rejected applications in that regard

163 Mertek Media Monitor (2026), International Press Institute (2026) and Reporters Without Borders (2026).

164 Foremost among which the Sovereignty Protection Act.

165 From government press conferences and other events.

166 The Repression of Independent Media in Hungary 2010-2025 (2026), Rule of Law Lab and Mertek Media Monitor.

167 Media Pluralism Monitor (2026), pp. 14-15.

168 Council of Europe Platform to promote the protection of journalism and safety of journalists (2026).

169 European Centre for Press and Media Freedom (2026).

170 See 2025 Rule of Law Report, Hungary, p. 23. Government Decree 343/2025 of 31 October 2025 amended Government Decree 424/2022 of 28 October 2022 by further extending the 'state of danger' until 13 May 2026. 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 2025 of LXXVII. Act XLII of 2022 became inapplicable on 15 May 2026 (see Section 6(2)). In parallel, Hungary has been under a 'crisis situation caused by mass immigration' since 10 March 2016; this has been further extended until 7 September 2026.

171 E.g. Government Decree 129/2025 of 5 June 2025 prohibited credit institutions from decommissioning automatic teller machines. Government Decree 358/2025 of 13 November 2025 amended the rules on the sectoral tax for credit institutions and financial enterprises. Government Decrees 252/2025 of 7 August 2025, 304/2025 of 6 October 2025 and 324/2025 of 20 October 2025 amended the rules on reorganisation, bankruptcy and winding-up of certain companies. Government Decree 293/2025 of 24 September 2025 granted the Minister of Justice full access to all documents and information related to the ongoing criminal investigation into the alleged crimes committed in a secured youth detention centre. Government Decree 49/2026 of 9 March 2026 introduced measures 'necessary in the interest of national security in connection with the unusual quantities of cash and gold bars transported through the territory of Hungary'.

on formal grounds[172]. Additionally, the governing majority elevated most of these emergency measures, which were intended to address a temporary exceptional situation, to the level of statutory law[173]. Stakeholders reported that the extensive and prolonged use of the former government's emergency powers, with measures often adopted at short notice and amended frequently, undermined legal certainty[174].

The law-making process remains a cause for concern, and certain important legislative processes have not been subject to public consultation requirements. Under the former government, public consultations were formalistic, and the legislative procedure offered limited opportunities for stakeholders to effectively intervene or influence the decision-making process[175]. According to stakeholders, compliance with public consultation rules was neither effectively monitored nor enforced[176]. The quality of the impact assessments of draft legislation and the summaries published during the public consultation process were criticised by stakeholders for being inadequate[177]. The omnibus law of June 2026 extended the public consultation requirement to cover specific topics[178]. In May 2026, the new Parliament established a new Committee on Social Participation with the intention of facilitating stakeholder involvement in the legislative process[179]. In 2025, the National Assembly adopted two laws in urgent procedure[180] and five laws in exceptional procedure[181].

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172 In 2025, the Constitutional Court considered 24 cases based on constitutional complaints, judicial initiatives, or petitions for posterior norm control, with the aim of reviewing the constitutionality of emergency measures. Nine petitions were rejected on formal grounds, and the Court discontinued the procedure in 15 cases because the challenged norm had been repealed in the meantime. According to the new Government, the Constitutional Court adjudicates within the limits of the petitions submitted to it and has no power to review emergency measures of its own motion (ex officio).

173 E.g. Act L of 2025 'on raising emergency decrees promulgated in view of the armed conflict in Ukraine to the level of an Act of Parliament'; Act CXXV of 2025 'on the amendment of certain Acts of Parliament serving to protect public order and strengthen public safety, combat terrorism and maintain unity of the legal system', Act XIV of 2026 'on raising emergency decrees promulgated in view of the armed conflict in Ukraine to the level of an Act of Parliament'.

174 Amnesty International Hungary et al. (2026), p. 80. See also 2025 Rule of Law Report, Hungary, p. 23.

175 Country visit Hungary, Hungarian Chamber of Commerce and Industry. According to European standards, the legislative process needs to be efficient, transparent, inclusive and democratic, and the legislature should follow the standard legislative procedure and avoid resorting to expedited adoption of legal acts on a regular basis (Venice Commission, Updated Rule of Law Checklist (December 2025), para. 34).

176 Amnesty International Hungary et al. (2026), p. 75, Háttér Society (2026), p. 20. The statutory minimum consultation period of eight days is observed, regardless of the length and complexity of the draft law. Explanatory memoranda are very brief, often containing one general sentence. The authorities ignore the overwhelming majority of stakeholder contributions without providing any meaningful reasoning. Some pieces of legislation are presented to Parliament or adopted while the consultation period is still open. The government control body conducts annual audits to verify whether the ministers responsible for preparing legislation fulfil their obligations under the Public Participation Act and prepares an annual report on the results of the audits and the fines imposed.

177 Amnesty International Hungary et al. (2026), p. 76. As of 15 January 2025, a new impact assessment sheet was introduced. According to the new Government, the procedure of public consultation complies with the provisions of Public Participation Act.

178 These topics include the decree determining the names that parents can legally give to their children, as well as all matters relating to nature conservation or environmental protection (see Section 13 of the omnibus law of June 2026, amending Section 5 of the Public Participation Act).

179 The Committee will also facilitate thematic public hearings involving CSOs, trade unions, economic chambers, and other organisations representing various social interests, to determine whether the Parliament's further legislative action is necessary (additional input from the new Government).

180 Primarily used to expedite bills that require relatively quick adoption without completely bypassing parliamentary debate. The time between the decision to use the urgent procedure and the final vote cannot be less than six days. It can be invoked a maximum of six times per calendar semester.

181 The detailed debate occurs in a designated committee (the Committee on Legislation) rather than in plenary. There is no general debate in the plenary session; the plenary only meets the proposal for the final debate

On 23 June 2026, Parliament extended the possibility of such deviations from the general procedural rules until the end of the year[182]. The former government continued its practice of including only technical amendments in draft laws, before introducing new, substantive amendments to the bill at a late stage in the legislative process through the Committee on Legislation, just before the final parliamentary vote. This prevented regular parliamentary debate and public consultation. Cardinal acts are still being used beyond what is strictly necessary, and even in respect of detailed legislation; this makes it difficult to introduce reforms in the future as their adoption or amendment requires two-thirds of the votes of the members of Parliament present[183].

Less than half of companies surveyed in Hungary express confidence in the effectiveness of investment protection. 49% of companies are very or fairly confident that investments are protected by law and courts, a figure which has slightly increased in comparison with 2025 (46%)[184]. The main reason among companies for their lack of confidence are the frequent changes in legislation or concerns about quality of the law-making process (28%)[185]. As regards authorities relevant for economic operators, 21% of companies perceive the level of independence of the national competition authority (Competition Authority) as very or fairly good, a figure which has significantly decreased in comparison with 2025 (37%)[186]. The *Kúria* has jurisdiction in several business-related cases, including in cases related to public procurement, public concessions, public contracts and economic regulation. A number of judicial mechanisms to improve efficiency are available in these cases, including the possibility to apply interim measures and the consolidation of multiple appeals[187].

Foreign companies, including those from other EU Member States, operating in strategic sectors, continue to face intensified regulatory pressure from state action. Stakeholders report that, over recent years, a consistent pattern of targeted legislation and administrative practice has disproportionately affected foreign-owned companies and cumulatively undermined legal certainty, market access and the freedom of establishment. These measures span over multiple sectors and have resulted in sustained de-investment, distortion of competition and a progressive deterioration of investor confidence. A core concern is the persistence of tailor-made sectoral legislation and special taxes that effectively remove the financial base of foreign investors, adversely affecting the operation of the single market[188]. In the food retail sector, market leaders, which are predominantly multinational companies, continue to be affected by the progressive retail tax, while Hungarian cooperatives benefit from significantly lower taxation due to a preferential treatment of their

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and vote. Unlike the urgent procedure, there is no minimum timeframe between the decision and the final vote, allowing for extremely rapid passage. It can be used only four times per calendar semester.

182 Resolution 35/2026 (VI. 23.) OGY of the National Assembly amending Resolution 10/2014 (II. 24.) OGY on certain provisions of the Rules of Procedure. The maximum number of urgent procedures per semester was increased from six to 15, and the maximum number of exceptional procedures was increased from four to 10.

183 See 2020 Rule of Law Report, Hungary, p. 16. The Seventeenth Amendment to the Fundamental Law would reduce the number of issues to be regulated through a cardinal law.

184 Figure 52, 2026 EU Justice Scoreboard.

185 Figure 53, 2026 EU Justice Scoreboard. 22% of the surveyed investors perceive concerns about quality, efficiency or independence of justice as a reason for the lack of confidence in investment protection.

186 Figure 60, 2026 EU Justice Scoreboard.

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

188 Ost-Ausschuss der Deutschen Wirtschaft – German Eastern Business Association (2026), pp. 21-22; WKÖ – Austrian Federal Economic Chamber (2026), pp. 21-22.

store networks. On 29 April 2026, the Commission decided to refer Hungary to the Court of Justice for failing to abolish its retail tax regime[189]. Price and price margin regulation regimes further exacerbate the situation[190]. Foreign retailers also face systematic restrictions on expansion[191]. Comparable discriminatory patterns exist in the construction materials industry. Measures include export restrictions[192], mandatory production volumes, supplementary mining royalties of up to 90% of turnover[193] and a carbon dioxide quota tax combined with a transaction fee on free EU emissions trading system allowances[194]. On 11 June 2025, the National Assembly passed an omnibus law that turned these emergency measures into statutory legislation[195]. In the mining sector, further practices can be observed, such as non-transparent and discriminatory tender procedures for sand and gravel mining sites that limit competition[196].

The legal framework that allows the selective application of competition rules further weakens legal certainty for businesses. The December 2025 amendment to the national competition rules allows the Competition Authority to declare a mining or construction undertaking 'to be of cross-market significance' and impose far-reaching obligations on it, without the need to show any breach of competition rules[197]. The possibility for the

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189 INFR(2024)4022. Due to the current design of the retail tax regime, foreign controlled retail companies operating in Hungary as integrated companies or linked undertakings, are subject to high and steeply progressive tax rates on their turnover. Domestic retailers operating on the Hungarian market under their respective brands and logos via franchise systems are not subject to the same highest rates because their turnover is not consolidated for taxation purposes.

190 First, the CJEU ruled that the price cap measure introduced by the Hungarian authorities in 2022 violates EU law (judgment of 12 September 2024, *SPAR Magyarország*, C-557/23). Then, the CJEU found that the mandatory promotion scheme introduced in 2023 in the food retail sector is in breach of EU agricultural and internal market rules (judgment of 18 June 2026, *Penny Market*, C-658/24). Most recently, on 8 July 2026, the Commission decided to refer Hungary to the CJEU in two infringement cases concerning measures that impose price margin restrictions on all non-Hungarian businesses but only some Hungarian firms. One procedure (INFR(2025)2052) concerns restrictions with regard to the sale of certain food products by food retailers (see also joint cases C-840/25, *Penny Market II* and C-10/26, *Lidl Magyarország*, pending before the CJEU). The other procedure (INFR(2025)2102) covers similar restrictions for the sale of certain non-food products by drugstores.

191 Under the long-standing 'Plaza Stop' regime, permits are required for the construction, renovation, leasing or acquisition of retail spaces measuring over 400 square metres. In practice, permits for multinational retailers are routinely denied without transparent reasoning. A tightening of the regulations in 2025 invalidated existing permits upon ownership or tenancy changes, effectively blocking all expansion. Further limitations introduced by Government Decree 280/2024 of 30 September 2024 restrict the maximum size of stores in residential areas to between 400 and 800 square metres.

192 On 13 November 2025, the CJEU found that the procedure established by Hungary for exports of raw materials and construction materials is contrary to EU law (case C-499/23, *Commission v Hungary (Construction materials for critical infrastructure)*). On 11 March 2026, the Commission decided to further pursue an infringement procedure by sending a letter of formal notice to Hungary (INFR(2021)2158) under Article 260 TFEU for not complying with the judgment in case C-499/23.

193 On 22 January 2026, the CJEU ruled that the additional mining fee introduced by Hungary infringes EU law (judgment of the CJEU, case C-144/24, *Commission v Hungary (Additional mining fee)*). Under the new Government, the authorities decided not to collect the supplementary mining royalties from 1 June 2026. On 8 July 2026, the Commission called on Hungary to comply with the judgment.

194 On 18 June 2025, the Commission opened an infringement procedure (INFR(2025)4016) for applying a carbon quota tax and a transaction fee to recipients of a significant free allocation of allowances under the EU Emissions Trading System, as those charges interfere with EU law. On 16 April 2026, in a preliminary reference case, the CJEU found that the national carbon quota tax under Government Decree 320/2023 of 17 July 2023 was incompatible with EU law (judgment of the CJEU, case C-519/24, *Nitrogénművek*).

195 See Sections 92-95, 119-122 and 243-245 of Act L of 2025.

196 See infringement procedure INFR(2025)2051.

197 In particular, the Competition Authority can oblige shareholders to divest their shares partly or fully (Act XCVIII of 2025 amending the Competition Act, see in particular Section 43/F). See also HVG.hu (2025b).

Government to interfere with the application of merger control rules continues to give rise to legal uncertainty[198]. The Competition Authority reportedly continues to apply the rules selectively[199].

Issues remain with the way institutional checks and balances are applied. Concerns remain regarding the independence and effective functioning of the Commissioner for Fundamental Rights[200]. On 22 September 2025, the National Assembly – voting with a two-thirds majority as required by the Fundamental Law – elected a new Commissioner, following a recommendation by the President of the Republic, with no prior call for applications or meaningful consultation with civil society and professional organisations. Shortly after the new Commissioner took office, position papers by the former deputy Commissioner for the Rights of Minorities, published after the expiry of her mandate, were removed from the Commissioner's website[201]. On 6 February 2026, the Commissioner for Fundamental Rights requested that the Constitutional Court assesses whether the rules of Regulation (EU) 2024/900 on the transparency and targeting of political advertising are compatible with the Fundamental Law's provisions on conferral and political advertisement and whether the Regulation must be 'set aside' if found incompatible with these provisions[202]. The Constitutional Court, composed of members elected by the National Assembly without the involvement of the judiciary, is still reviewing the merits of final rulings by ordinary courts in politically sensitive cases[203]. The Constitutional Court does not

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198 2025 Rule of Law Report, Hungary, p. 26. The Government can still declare certain mergers and acquisitions to be of 'strategic importance for the national economy'. 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 review 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.

199 2025 Rule of Law 2025, Hungary, p. 26. According to stakeholders (Amnesty International Hungary et al. (2026), p. 55; K-Monitor (2026), p. 28; Transparency International Hungary (2026), p. 24), more recent examples include the cartel investigations opened into companies owned by an entrepreneur who has publicly criticized the governing party (see also HVG.hu (2025a)) and by a businessman who divorced the daughter of a tycoon close to the former Prime Minister (see also 24.hu (2025a)).

200 The Commissioner for Fundamental Rights continues to be downgraded by the Global Alliance of National Human Rights Institutions (GANHRI) from 'A' to 'B' status due to its inactivity in a number of areas (e.g. the rights of ethnic minorities, LGBTI+ persons, human rights defenders, refugees and migrants, media pluralism, civic space and judicial independence), which has evidenced a lack of independence and compromised compliance with the Paris Principles. GANHRI also deemed the Commissioner's selection and appointment process to be insufficiently broad and transparent (see 2024 Rule of Law Report, Hungary, p. 33). The downgrade was decided in a reaccreditation procedure reviewing the 2014–2019 period and predates the mandate of the incumbent Commissioner, elected in September 2025 by a two-thirds parliamentary majority; the Office of the Commissioner has formally challenged the downgrade (further input from the new Government).

201 Qubit (2025). The work of the deputy commissioner was considered vital public documentation of the situation of vulnerable groups, including hate crimes and hate speech. According to the office of the new commissioner, the documents concerned were published on 4 November 2025, after the expiry of the former Deputy Commissioner's mandate, and did not meet the statutory requirements of Act CXI of 2011, under which only the Commissioner is entitled to issue reports on inquiries, while Deputy Commissioners may issue policy statements within their field of competence following professional consultation with the Commissioner. Nevertheless, all policy statements and documents lawfully issued by the former Deputy Commissioner during her mandate remain accessible in the Office's archives.

202 Case X/00538/2026, pending.

203 E.g. the Constitutional Court annulled a *Kúria* decision that allowed a referendum on the verification of asset declarations (Decision 7/2025. (VII. 24.) AB). It also annulled a *Kúria* decision finding the public broadcaster in breach of the requirement for balanced programming by predominantly covering the governing party's political campaign (cases IV/825/2026 and IV/964/2026). According to the new Government, the constitutional complaint against final judicial decisions is a general individual remedy

have a transparent case allocation scheme in place, nor is it bound by procedural deadlines when hearing constitutional complaints[204]. The omnibus law of June 2026 repealed the provision in the Constitutional Court Act, introduced in December 2023, which allowed the Constitutional Court to give an advisory opinion – upon request of the Court of Justice of the EU – on the interpretation of the rules related to a series of constitutional elements[205].

A constitutional revision process has been initiated. The Seventeenth Amendment to the Fundamental Law would reinstate a retirement age of 70 for members of the Constitutional Court. Consequently, the terms of office of four of the 15 members, including the president, would expire when the constitutional amendment comes into effect. The Seventeenth Amendment would also allow the Constitutional Court to elect its own president and to review the constitutionality of tax laws[206]. Moreover, the constitutional amendment would terminate the mandate of the incumbent President of the Republic[207]. Following public consultation, the Seventeenth Amendment was adopted by the National Assembly on 13 July 2026 and is yet to be promulgated.

Effective judicial review of administrative decisions is lacking in sensitive cases. An omnibus law adopted on 21 October 2025 amended the Code of Administrative Litigation, seeking to streamline the judicial review of administrative decisions[208]. Procedural rules assign an increasing list of cases to the *Kúria* as a first and last instance court[209]. In some cases, no judicial review is available at all. This notably included investigations and reports by the Sovereignty Protection Office[210]. Similar provisions are being considered for certain proceedings of the future National Asset Recovery and Protection Office. Also, on 3 February 2026, an emergency measure[211] issued by the former government under the ‘state of danger’ regime removed municipalities’ ability to challenge before the competent courts administrative decisions related to the ‘solidarity levy’ imposed on them by the former

available to any party in any individual case who alleges the violation of a right guaranteed by the Fundamental Law.

204 See 2025 Rule of Law Report, p. 26. There is no deadline for the final decision to be taken in a constitutional complaint procedure. Under Section 53(1) of the Internal Rules of Procedure, the Constitutional Court must decide on the admissibility of a constitutional complaint within 120 days of the Secretary General’s notification of the initiation of proceedings, and under Section 53(2), the rapporteur judge must submit the first draft within 180 days of admission. The average time taken to resolve constitutional complaints was 290 days in 2025 and 287 days in the first quarter of 2026.

205 Section 35 of the omnibus law of June 2026, repealing Section 1c) and Sub-title 16/A of the Constitutional Court Act. See 2024 Rule of Law Report, Hungary, pp. 35-36.

206 T/324.

207 Following the termination of the mandate of the President of the Republic in office, the National Assembly would elect a President of the Republic for a term lasting until the date of entry into force of a new Constitution, but for a maximum period of five years.

208 Act LXXIX of 2025 amended the Code of Administrative Court Procedure. The new rules make it easier for unrepresented individuals to submit petitions to the court, clarify the composition of the bench (whether a single judge or a panel of judges will hear the case) in certain instances, and speed up the process.

209 These include cases related to elections, referenda, freedom of assembly, ‘suspension’ of citizenship.

210 Section 8(2) of the Protection of National Sovereignty Law. The Constitutional Court did not rule this provision as unconstitutional (Decision 20/2024. (XI. 28.) AB).

211 Government Decree 15/2026 of 3 February 2026. The decree came into force on 4 February 2026. Under the emergency measure, courts were also prevented from granting immediate legal protection (interim relief) in such cases. Introduced in 2012, the municipal ‘solidarity levy’ redistributes some of the revenues from local business taxes from wealthier municipalities to poorer ones. Its rate has increased steadily over time. According to the Constitutional Court, the local governments concerned must be involved in this procedure and it must be ascertained that the collection of the levy does not endanger their functioning.

government; it also obliged courts to discontinue ongoing cases[212]. In certain cases, following annulment by the courts, the authorities fail to adhere to the legal interpretation set out in the court judgment that overturned the administrative decision. This forces citizens and businesses to challenge such decisions in court repeatedly within the same case[213]. In the context of the possibility to 'suspend' the citizenship of a Hungarian citizen who also holds the citizenship of another State, the Venice Commission found that the rigid procedural time-limit for contesting the administrative decision and the absence of a suspensive effect of an application to the court (the *Kúria*), combined with a risk of expulsion following the suspension of citizenship, may adversely affect the effective exercise of the right to judicial review by the person concerned[214].

On 1 January 2026, Hungary had 49 leading judgments of the European Court of Human Rights pending implementation, an increase of 2 compared to the previous year[215]. At that time, Hungary's rate of leading judgments from the past 10 years that had been implemented was at 29% (compared to 26% in 2025; 71% remained pending), and the average time that the judgments had been pending implementation was 6 years and 9 months (compared to 6 years and 6 months in 2025)[216]. The oldest leading judgment, pending implementation for more than 16 years, concerns the violation of the right to freedom of assembly[217]. As regards the respect of payment deadlines, on 31 December 2025 there were 24 cases in total awaiting confirmation of payments (compared to 32 in 2024)[218]. On 17 June 2026, the number of leading judgments pending implementation had increased to 53[219].

The absence of procedural safeguards and effective oversight in the event of secret surveillance measures outside of criminal proceedings is a concern that still has not been addressed[220]. The relevant judgments of the European Court of Human Rights have not yet been executed[221]. On 11 June 2026, the Committee of Ministers of the Council of Europe invited the Hungarian authorities 'to advance the necessary legislative reforms to ensure that the domestic framework on secret surveillance for national security purposes fully and effectively complies with the Convention, addressing all shortcomings identified by the Court'[222]. In a judgment of 3 February 2026, the European Court of Human Rights found that

212 Pursuant to a motion submitted by the National Judicial Council, on 6 May 2026, the Constitutional Court annulled the justice-related provisions of the emergency measure (case IX/673/2026).

213 Country visit Hungary, Háttér Society. This phenomenon was already described in the CJEU's judgment of 29 July 2019, *Torubarov*, Case C–556/17.

214 Venice Commission (2025), paras. 68 and 69. The possibility to 'suspend' Hungarian citizenship was introduced by the Fifteenth Amendment to the Fundamental Law (See Article G(3)) and Act LXIV of 2025, inserting Sections 9/A to 9/E to Act LV of 1993.

215 For an explanation of the supervision process, see the website of the Council of Europe.

216 All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2026. EIN (2026), written input, p. 5.

217 Judgment of the ECtHR, 5529/05, *Patyi and Others v. Hungary*, pending implementation since 2009.

218 Council of Europe (2026), p. 162.

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

220 See 2025 Rule of Law Report, Hungary, pp. 26-27.

221 Judgments of the ECtHR, 37138/14, *Szabó and Vissy v Hungary*, 58032/16, *Hüttl v Hungary* and 31091/16, *Klaudia Csikós v Hungary*.

222 CM/Del/Dec(2026)1563/H46-19. In the *Klaudia Csikós* case, the Committee of Ministers 'noted with interest the new Code of Criminal Procedure, which has introduced a number of safeguards in respect of covert investigative measures in criminal proceedings, including a clearer definition of the persons who may be subject to such measures, the requirement of a prior balancing exercise with particular emphasis on the protection of journalists and their sources, and an obligation to notify individuals of such measures after the fact'.

the provisions in the Police Act[223] relating to integrity testing carried out by the National Protective Service and the use of related secret surveillance fail to satisfy the requirements of Article 8 of the European Convention on Human Rights due to the indiscriminate nature of the measures in question and the lack of adequate safeguards[224]. An emergency measure issued by the former Government under the 'state of danger' regime authorised the National Tax and Customs Administration on an ad hoc basis to engage in covert information gathering without applying the rules on criminal procedure[225].

Independent civil society organisations continued to be under pressure under the former government, whilst some progress has been made under the new government on the recommendation to remove obstacles hindering the work of civil society organisations[226]. Civic space continues to be rated as 'obstructed' by Civicus[227]. Although the statutory framework for setting up civil society organisations (CSOs) aligns with European standards[228], the complexity of the registration procedure may pose a challenge for smaller organisations with limited resources[229]. CSOs, particularly those with public benefit status, must comply with extensive documentation and reporting obligations[230]. Although several public assemblies aimed at promoting equality and diversity were banned by the police, as confirmed partially by the *Kúria*, 'Pride events' were held in Budapest and Pécs on 28 June and 4 October 2025, respectively. Despite the new rules, no fines were imposed on the participants of these events. In the criminal cases brought against the organisers of the Pride events held in Budapest and Pécs in 2025, the prosecution office decided on 4 June 2026 to drop the charges; the competent courts consequently dismissed the cases[231]. On 27 June 2026, the Budapest Pride took place with the assistance of the police. Further legislation hampering CSOs' capacity of working remains in force, although it is not being applied in

223 See pillar II. These measures include the secret observation of individuals, places or vehicles; the gathering of information about what has happened in such places and the recording of such happenings by technical tools, such as video or audio recording. They also include the obtaining of data necessary to establish the communication via electronic devices or to identify or locate such devices.

224 Judgment of the ECtHR, 15147/23 and 38303/23, *Szelényi and Others v Hungary*.

225 Section 2(3) of Government Decree 49/2026 of 9 March 2026 on the measures necessary in the interest of national security in connection with the unusual quantities of cash and gold bars transported through the territory of Hungary.

226 The 2025 Rule of Law Report recommended that Hungary '[e]nsure 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'. No progress was previously assessed on this recommendation in 2025, 2024 and 2023.

227 Ratings by Civicus are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed. The score for Hungary is 46/100. In 2023, 61 076 CSOs were active according to the Hungarian Central Statistical Office. The number of registered CSOs remained stable, and no forced dissolutions of CSOs were reported (Monitoring Action for Civic Space, Country Report, 2025: Hungary, p. 7).

228 Article 11 of the European Convention on Human Rights and Recommendation CM/Rec(2007)14 of the Council of Europe.

229 Amnesty International Hungary et al. (2026), pp. 96-97. According to the new Government, a Civil Community Service Centre Network provides administrative support to CSOs. They offer a free, public professional advisory service covering legal and public-benefit issues, as well as financial, accounting, and taxation matters.

230 Amnesty International Hungary et al. (2026), p. 97; Centre for Reproductive Rights (2026), p. 23.

231 The Pest Central District Court and the Pécs District Court, which were hearing the criminal cases brought against the organisers, had decided to suspend the proceedings and challenged certain provisions of the 'child protection law' and the Freedom of Assembly Act before the Constitutional Court (cases III/00880/2026 and III/00898/2026). On 21 April 2026, the CJEU found that by adopting a law which stigmatises and marginalises LGBTI+ persons, Hungary had acted in breach of EU law (judgment of the CJEU, case C-769/22, *Commission v Hungary (Values of the European Union)*). Relying on that judgment, on 4 June 2026, the prosecution service dropped the charges.

practice[232]. On its election platform, the new Government committed to repealing laws that restrict and stigmatise the activities of CSOs. Critical narratives targeting independent CSOs ceased following the general elections of 12 April 2026. Under the former government, pressure on activists in rural areas was intensified by threats of losing employment in the public sector[233]. Stigmatisation was further exacerbated under the former government by reports of the Sovereignty Protection Office that continued to conduct investigations into various CSOs and media outlets[234]. A constitutional amendment and a legislative amendment, adopted on 15 and 30 June 2026, respectively, abolished the Sovereignty Protection Office as of 15 July 2026[235]; the infringement proceedings brought by the Commission are pending[236]. Under the former government, the distribution of State funding earmarked for civil society privileged government-aligned organisations[237]. The number of public interest trusts (PITs), as well as the value of the public assets transferred to these organisations and the public funding they received from the national budget, increased further under the previous government[238]. A constitutional amendment adopted on 15 June 2026 and the omnibus law of June 2026, allow the Government to phase out PITs, renationalise their assets received from the State and to appoint and remove in the transitional period their board members who need to meet strict eligibility criteria[239]. Independent CSOs continue to depend on foreign institutional and private donors[240]. Under the former government, CSOs receiving grants from abroad were among the primary targets of smear campaigns, including reports of the Sovereignty Protection Office[241]. Stakeholders reported deteriorating conditions as some CSOs had given up on applying for certain foreign funds or renounced previously awarded foreign funding. Stakeholders reported that some CSOs had given up on certain activities and limited their communication critical of the former government[242]. Overall, given measures

232 See Section 253 of Act XLI of 2018 introducing a special 25% immigration tax applicable to financial support received by organisations carrying out ‘activities facilitating immigration’ and Section of 353/A of Act C of 2012 that deters the provision of legal assistance to asylum-seekers through criminalisation. Under Act XLIX of 2021 ‘on the transparency of organisations carrying out activities capable of influencing public life’, the State Audit Office continues to publish yearly summary reports, without mentioning specific CSOs. The draft law ‘on transparency in public life’, tabled on 13 May 2025 (see 2025 Rule of Law Report, Hungary, p. 28), is no longer pending before the National Assembly.

233 Monitoring Action for Civic Space, Country Report, 2025: Hungary, p. 6.

234 On 4 December 2025, the Budapest Regional Court ruled that a report published by the Office in 2024 had wrongly accused *Átlátszó*, an investigative portal, of spying and spreading disinformation (Judgment 19.P.20.067/2025/19). On 28 May 2026, the Budapest Regional Appeal Court quashed the judgment, and remitted the case to the first-instance court.

235 Article 3 of the Sixteenth Amendment repealing the second sentence of Article R(4) of the Fundamental Law and Act XXIV of 2026.

236 Case C-829/24. On 12 February 2026, Advocate General Kokott invited the Court to find that Hungary has infringed EU law by adopting the Law on the protection of national sovereignty.

237 444.hu (2025). There are several state instruments, e.g. the National Cooperation Fund and the City and Village Civil Funds, that support CSOs with significant amounts: the former with HUF 16 billion (EUR 45 million), while the latter with HUF 4.8 billion (EUR 13.5 million) each in 2025.

238 The ÉLVONAL Top Research and Talent Development Foundation was established by Act LII of 2025. The ZalaZONE Foundation was established by Act LIII of 2025.

239 Article 4 of the Sixteenth Amendment repealing Article 38(6) of the Fundamental Law, Article 5 of the Sixteenth Amendment introducing point 33 to the closing and miscellaneous provisions of the Fundamental Law and the omnibus law of 2026 amending the PIT Act and repealing the dedicated laws authorising the government to endow PITs that do not maintain higher education institutions in Hungary. Such PITs will need to be de-registered by 31 August 2026. PITs maintaining higher education institutions in Hungary will be de-registered by 1 August 2027. See also pillar II.

240 CSOs also rely on 1% of personal income tax based on citizens’ assignation, as well as on micro-donations, which they collect with increasing efficiency Ökotárs (2026), p. 24.

241 Monitoring Action for Civic Space, Country Report, 2025: Hungary, p. 8. Ökotárs (2026), p. 17.

242 Amnesty International Hungary et al. (2026), p. 100.

such as the abolition of the Sovereignty Protection Office, some progress has been made on this recommendation.

Annex I: List of sources in alphabetical order*

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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 LXXXVII of 2013 on the transparency of campaign costs for the election of Members of Parliament

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 CXXV of 2018 on Government administration ('the Government Administration Act')

Act XXVII of 2022 on the control of the use of European Union budget funds ('the Integrity Authority Act')

Act XXV of 2023 on complaints and public interest disclosures, and on the rules of whistleblowing notifications ('the Whistleblowing Act')

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

Act XLIX of 2025 on the amendment of laws related to judicial matters

Act C of 2025 amending laws affecting the financial intermediary system

Act XVIII of 2026 on the amendment of certain Acts necessary for accessing European Union funds ('the omnibus law of June 2026')

Annex II: Country visit to Hungary

The Commission services held virtual meetings in February 2026 with:

- Amnesty International Hungary
- *Átlátszó*
- Buda Central District Court
- Corruption Research Center Budapest
- Hungarian Association of Journalists *(MÚOSZ)*
- Hungarian Association of Judges *(MABIE)*
- Hungarian Bar Association *(MÜK)*
- Hungarian Civil Liberties Union *(TASZ)*
- Hungarian Helsinki Committee
- Integrity Authority
- K-Monitor
- Mathias Corvinus Collegium
- 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:

- Civil Liberties Union for Europe
- Civil Society Europe
- End FGM EU
- European Civic Forum
- European Partnership for Democracy
- Human Rights Watch
- ILGA-Europe
- International Federation for Human Rights
- Philea - Philanthropy Europe Association
- Transparency International EU