



# ANTI-CORRUPTION TASK FORCE ANNUAL REPORT FOR 2025

2026

# Table of Contents

<b>PART 1: SUMMARY OF THE ACTIVITIES OF THE ANTI-CORRUPTION TASK FORCE IN 2025</b>	3
<b>1. Mandate and activities of the Task Force</b>	4
<b>2. Reform of the functioning of the Task Force</b>	4
<b>3. Meetings of the Task Force in 2025</b>	6
3.1 Meetings of the Expert Committee	6
3.2 Plenary meetings of the Task Force	6
<b>4. Summary</b>	7
<b>PART 2: “SUMMARY OF THE THEMATIC REPORT TITLED “THE ROLE OF EDUCATION AND THE SHAPING OF SOCIAL ATTITUDES IN PREVENTING CORRUPTION RISKS AND CORRUPT PRACTICES”</b>	9
<b>1. Objective and methodology of the thematic report</b>	10
1.1 Objective of the thematic report	11
1.2 Methodology of the thematic report	13
1.3 International standards	14
<b>2. National context</b>	15
2.1 Education and the shaping of social attitudes in the public sector	15
2.2 Education and the shaping of social attitudes in the economic sector	21
2.3 The role of civil society communities and the media in education and the shaping of social attitudes	21
2.4 Role of the education sector in the shaping of social attitudes	23
2.5 Harmonising approaches in the shaping of social attitudes and experiences	24
<b>3. International examples and lessons</b>	26
<b>4. Proposals by the Anti-Corruption Task Force</b>	27
<b>PART 3: MONITORING OF THE IMPLEMENTATION OF PROPOSALS SET OUT IN THE 2022 AND 2023 REPORTS</b>	31
<b>I. Introduction</b>	32
<b>1. Evaluation of the implementation of the proposals in the 2022 Report</b>	34
1.1 Review of the implementation of the proposals in 2022	34
1.2 Proposals set forth in the 2022 Report currently being implemented	40
<b>2. Evaluation of the implementation of the proposals in the 2023 KEMCS Report</b>	45
2.1 Review of the implementation of the proposals in 2022	45
2.2 Proposals set forth in the 2023 Report currently being implemented	50

**SUMMARY OF THE  
ACTIVITIES OF THE  
ANTI-CORRUPTION  
TASK FORCE IN 2025**

PART 1

# 1. Mandate and activities of the Task Force

Act XXVII of 2022 on the control of the use of European Union budget funds (“Integrity Authority Act”), which entered into force on 11 October 2022, established the Integrity Authority (“Authority”), as well as the Anti-Corruption Task Force (“Task Force” or “KEMCS”) operating alongside it, with a view to creating an institutional system for more effective control of the use of European Union funds and ensuring compliance with the measures proposed in the procedure under Regulation (EU) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget.

The Anti-Corruption Task Force is a body independent of the Integrity Authority, tasked with performing advisory and decision-preparatory functions. The composition of the Task Force is parity-based: its 21 members consist of ten representatives from non-governmental actors, ten members delegated by state agencies, and the President of the Integrity Authority.

The Task Force is responsible for evaluating existing anti-corruption measures and formulating proposals in relation to the detection, persecution and sanctioning of corrupt practices, criminal offences and other practices under Section 50(1) of the Integrity Authority Act; for submitting proposals for measures intended to enhance the prevention and detection of corruption or to improve the information flow between public administrative, audit and investigating authorities.

Pursuant to Section 50(1)c) of the Integrity Authority Act, the Task Force is tasked with preparing an annual report which analyses the risks and trends of corruption and corrupt practices and sets forth proposals for the prevention, detection and sanctioning of various types of corruption and corruption risks. Furthermore, the Task Force assesses the efficiency of the implementation of the related measures and the extent to which legislative and non-legislative initiatives and government programmes followed and carried out its earlier proposals. Pursuant to Section 51(1) of the Integrity Authority Act, the Task Force is required to adopt its annual report by 15 March of the year following the year under review.

# 2. Reform of the functioning of the Task Force

In 2025, the Task Force adopted decisions on two draft annual reports submitted concurrently. In its Decision No 6/2025 of 30 April 2025, the Task Force rejected the draft report presented by the members representing the Government’s side, while its Decision No 7/2025 of 30 April 2025 rejected the draft report proposed by the members representing non-governmental (civil society) actors. Having rejected the draft reports, the Task Force did not adopt an annual report for 2024.

Subsequently, the Secretariat of the Task Force conducted a questionnaire survey in June 2025 to explore the experiences and proposals related to the functioning of the Task Force. Based on the responses, the Secretariat prepared a summary report to provide a comprehensive picture of the experience gained on the functioning and reports of the Task Force, as well as the realisation of the body's proposals, using the data collected in the survey and the documents and information relating to the Task Force's operations to date.<sup>1</sup> On the basis of the review of the operations, several key decisions were adopted in the meeting of 18 September 2025, concerning the reform of the Task Force's functioning:

- **Decision No 10/2025 of 18 September 2025** unanimously endorsed the implementation of the rules of procedure reform, which includes the clarification of the exercise of statutory competences, the formalisation of the mechanisms for consensus, the reform of sub-task forces and workflows, as well as the introduction of virtual meetings.
- **Decision No 11/2025 of 18 September 2025** unanimously requires the Task Force to adopt annual plans of record setting out all objectives, tasks and interim deadlines.
- **Decision No 12/2025 of 18 September 2025** requires that the body establish theme-specific expert committees with fixed-term mandates, instead of permanent sub-task forces.
- **Decision No 13/2025 of 18 September 2025** supports the professional involvement of the Secretariat in the preparation of working documents, the development of the structure of interim reports, the determination of the lists of themes and priorities, as well as the administrative coordination of and organisational support for specialised task forces.
- **Decision No 14/2025 of 18 September of 2025** requires the Task Force to prepare shorter thematic interim reports as part of the annual report, while the themes are selected by the members through a vote based on the list compiled by the Secretariat.

Preparations for the 2022 and 2023 Reports had been previously carried out by the Task Force through five sub-task forces: the Public Procurement Sub-Task Force, the EU and National Funding Programmes Sub-Task Force, the Sub-Task Force for Public Availability of Public Data and Transparency, the Criminal Law and Criminal Proceedings Sub-Task Force, and the Rules of Procedure and Monitoring Sub-Task Force. Pursuant to the decision to establish a thematic expert committee, these sub-task forces were discontinued in 2025. With its Decision No 15/2025 of 18 September 2025, the Task Force decided to adopt a thematic report titled "*The Role of Education and the Shaping of Social Attitudes in Preventing Corruption Risks and Corrupt Practices*". In November 2025, the Task Force adopted its new Rules of Procedure<sup>2</sup> and Plan of Record, based on specific strategic directions and tasks.

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1 Anti-Corruption Task Force (2025). Renewing the functioning of the Anti-Corruption Task Force. [https://kemcs.hu/wp-content/uploads/2025/09/KEMCS\\_felulvizsgalat\\_jelentes.pdf](https://kemcs.hu/wp-content/uploads/2025/09/KEMCS_felulvizsgalat_jelentes.pdf) (5 January 2025)

2 KEMCS Rules of Procedure: <https://kemcs.hu/wp-content/uploads/2025/11/Ugyrend-2025.pdf> (5 January 2025)

# 3. Meetings of the Task Force in 2025

## 3.1 Meetings of the Expert Committee

For the preparation of thematic reports, in line with Section 11(3) of the Rules of Procedure adopted through Decision 18/2025 of 4 November 2025, the Task Force shall establish ad hoc expert committees whose mandates remain in force until its adoption by the plenary meeting of the Task Force. Participation in expert committees may be granted to members of the Task Force, to persons participating in the work of the Task Force as permanent invitees in a consultative and advisory capacity, as well as to individuals with consulting rights participating in the meetings upon the invitation of the Authority's President. The Expert Committee supporting the 2025 Thematic Report consisted of the following members of the Task Force: Zsolt Csampa (Ministry of Interior), dr. Rita Korom (Ministry of Interior), dr. Piroska Váradi (National Protective Service), dr. Tünde Martits (National Protective Service), dr. Dóra Kovács (Public Procurement Authority), Andrea Hágen (Public Procurement Authority), Bálint Horváth (Hungarian Competition Authority), dr. Petra Sutyinszki (Hungarian Competition Authority), Károly Fekete (National Tax and Customs Administration), Katalin Petró (State Audit Office), dr. Szilvia Várady (Vice Chair, Anti-Corruption Task Force), Tamás Sándor, Orsolya Vincze (K-Monitor Közhasznú Egyesület), Miklós Ligeti (Transparency International Magyarország Alapítvány), dr. Etelka Gregóczki (Ludovika University of Public Service), Katalin Ágnes Pályi (Ludovika University of Public Service), dr. Csilla Petró (Ludovika University of Public Service), dr. Gábor Kutasi (Hungarian Economic Association).

After the formation of the specialised body, three expert committee meetings focusing on integrity education and the shaping of social attitudes were held in 2025:

- **15 October 2025:** In this meeting, the Expert Committee assessed its operation and accomplishments to date. The Committee discussed and adopted a working document on the structure of a thematic report titled *“The Role of Education and the Shaping of Social Attitudes in the Prevention of Corruption Risks and Corrupt Practices”*. Furthermore, a thorough review of the Task Force's draft plan of record was also performed, with a particular emphasis on the tasks, responsibilities and milestones related to the compilation of the thematic report.
- **21 January 2026:** The KEMCS Secretariat informed the Expert Committee of the process of the compilation of the working documents related to the thematic report and of the results of the data collection process. During the remainder of the meeting, the available working documents were discussed, and the Committee aligned on the directions for further work, with particular regard to the professional steps necessary for finalising the report.
- **2 February 2026:** The Expert Committee adopted the working document related to the draft thematic report. At the close of the meeting, a summary was drawn up of the proposals and experiences related to the functioning of the Expert Committee, which are intended to facilitate its further operational improvement.

## 3.2 Plenary meetings of the Task Force

The Task Force convened eight times in 2025 and has held two meetings in 2026 as of 15 March. During its meetings in 2025, the Task Force adopted 21 decisions, the majority of which focused on the redefinition of the functioning and responsibilities of the Task Force. The body discussed the following topics at its meetings held in 2025:

- **21 January 2025:** KEMCS's Sub-Task Forces outlined their progress as set out in the plan of record and discussed methods for acquiring the data and statistics related to the annual report of the Task Force.
- **20 February 2025:** KEMCS's Sub-Task Forces outlined their progress as set out in the plan of record, and discussed interim reports whose adoption was postponed to a later date.
- **12 March 2025:** The adoption of the 2024 Annual Report was rescheduled.
- **30 April 2025:** Neither the draft report proposed by the Governmental nor the one presented by the non-governmental side was adopted. The Task Force therefore did not have an adopted annual report for 2024.
- **28 May 2025:** Representatives from Hong Kong's Independent Commission Against Corruption delivered a brief presentation on the activity of their organisation at the meeting of the Task Force. The functioning of KEMCS was also reviewed at the meeting.
- **18 September 2025:** The findings of the review of KEMCS's functioning were presented, and the body adopted the related decisions. The decisions set out the directions for operational improvement and the tasks necessary for its implementation.
- **4 November 2025:** The Task Force adopted its Rules of Procedure and the Plan of Record. A working document on the structure of a thematic report titled "The Role of Education and the Shaping of Social Attitudes in Preventing Corruption Risks and Corrupt Practices" was discussed and adopted. At the meeting, Police Lieutenant Colonel dr. Tünde Martits (National Protective Service) outlined the NPS's educational activity intended to reduce corruption risks. Subsequently, dr. Gabriella Nagy Fribicz (Integrity Authority) presented the Integrity Authority's 2024 Annual Analytical Integrity Report and the Government's response. The body also discussed the draft decision on the amendment to the Integrity Authority Act, intended to ensure that the Chairperson of the Task Force could participate in negotiations with the European Commission. After the discussion of the draft presented on the agenda, the necessary consultations were also scheduled.
- **4 December 2025:** The KEMCS Secretariat reported on the progress of the preparation of the thematic report titled "*The Role of Education and the Shaping of Social Attitudes in the Preventing Corruption Risks and Corrupt Practices*" and on the progress of the overview report on the implementation of the Task Force's previously formulated recommendations. Subsequently, Tamás Mehlhoffer (Integrity Authority) presented the Integrity Authority's educational initiative, the Integrity Academy, as well as its activities aimed at education and the shaping of social attitudes.

In relation to the preparation and adoption of the 2025 Annual Report, the body adopted five decisions and held two additional plenary meetings in 2026:

- **17 February 2026:** The Task Force decided to adopt the thematic report.
- **2 March 2026:** The Task Force decided on the adoption of the annual report. The content elements of the annual report include a summary of the activities of the Task Force carried out during the year under review, a presentation of the Task Force's thematic reports and proposals adopted in the same year, and the monitoring of the implementation of previously formulated recommendations.

## 4. Summary

The fundamental objective of the Task Force is to ensure cooperation built on constructive interaction which both state agencies and civil society organisations are interested in. Its functioning is shaped by its parity-based composition, a diverse professional background and an analytic and advisory role, the combination of which provides a stable foundation for a methodologically sound anti-corruption action. The reform measures adopted in 2025 and the reformed Rules of Procedure provide a more transparent and traceable operational framework for the body, while theme-specific ad hoc committees and the reinforced professional support from the Secretariat enable the targeted application of competencies.

The enhancement of the public profile of its work, the improvement of its working methods and the consideration of international standards help establish a wider professional consensus and align data requests. Regular thematic reports and recommendations strengthen continued dialogue and ensure that the activities of the Task Force make a meaningful contribution to the improvement of the national corruption prevention system.

# SUMMARY OF THE THEMATIC REPORT

**titled**

**“THE ROLE OF EDUCATION AND THE  
SHAPING OF SOCIAL ATTITUDES IN  
PREVENTING CORRUPTION RISKS AND  
CORRUPT PRACTICES”**

For the full report adopted by  
the Anti-Corruption Task Force, see:  
Annex 1

(The annexes are available in Hungarian)

PART 2

# 1. The objective and methodology of the thematic report

Section 51(1) of Act XXVII of 2022 on the control of the use of European Union budget funds (“Integrity Authority Act”) requires the Anti-Corruption Task Force (“Task Force” or “KEMCS”) to prepare an annual report by 15 March of the year following the year under review. In accordance with Section 11 of the Rules of Procedure, thematic reports that analyse risks and trends with regard to the themes set out by the Task Force and present recommendations and best practices form a part of these annual reports. The Task Force may form ad hoc expert committees to perform the tasks related to the preparation of these thematic reports.

On 18 September 2025, the Task Force decided to draw up a thematic report titled “*The Role of Education and the Shaping of Social Attitudes in Preventing Corruption Risks and Corrupt Practices*”, as well as to set up an ad hoc expert committee. The thematic report was adopted by the expert committee of the Task Force on 2 February 2026, while the plenary meeting of the Task Force adopted it on 17 February 2026 in order to formulate recommendations that help substantiate policy decision-making and foster the long-term reinforcement of a culture of integrity.

Figure 1: The structure and timeline of the thematic report



# 1.1 Objective of the thematic report

Corruption is not only a legal or institutional problem but a deeply rooted social and value-based phenomenon which weakens public trust in institutions and affects democratic functioning in the long term. For this reason, anti-corruption action cannot be restricted to legal, and, particularly, to criminal law instruments; instead, it inherently incorporates the shaping of social standards, customs and values. In this context, education and the shaping of social attitudes contribute to fostering ethical conduct, integrity and social resilience as a cross-generational preventive instrument.

Building on this insight, the thematic report is intended to provide a systemic review of the role of education and the shaping of social attitudes in preventing corruption risks and corrupt practices and identify directions that support further development on the basis of international best practices and domestic experience.

Table 1: Objectives of the thematic report in line with the Integrity Authority Act

## GENERAL OBJECTIVES

To provide a comprehensive assessment of the current situation and efficiency. To assess problems, deficiencies and missing elements.

**Legal basis: Section 50(1) of the Integrity Authority Act**

*“The tasks of the Task Force shall be the following:  
a) examining the existing anti-corruption measures and elaborating proposals (...)”*

- To make a comprehensive assessment of the current situation of anti-corruption education and the shaping of social attitudes in Hungary, with a special emphasis on the ongoing educational processes of public education, higher education, the public sector and the economic sector.
- To assess the current implementation of anti-corruption educational processes and their impact.
- To deepen the understanding of the rapport between different levels and stakeholders of corruption-related education and the shaping of social attitudes, and to explore the potential deficiencies therein.

## STRATEGIC OBJECTIVES

To explore possibilities of **long-term developments**.

### **Legal basis: Section 50(1)(b) of the Integrity Authority Act**

*“Putting forward proposals for measures aimed at improving corruption prevention and detection, including, in particular, measures regarding the effective use of all available corruption prevention and detection tools, and for measures (...)”*

- **To seek solutions** to strengthen the role of the shaping of social attitudes toward corruption at every level of education in the public sector in order to establish ethical conduct and compliance as a core value.
- To explore ways to strengthen the relationship and alignment among stakeholders in education and the shaping of social attitudes **to ensure that their activities related to anti-corruption education and the shaping of social attitudes are aligned.**

## OPERATIONAL OBJECTIVES

**Specific steps**, measures and analyses. To identify specific institutions, programmes and practical recommendations to foster development.

### **Section 50(1)(c) of the Integrity Authority Act**

*“Preparing, on the basis of the tasks set out in points a) and b), an annual report (...) analysing the risks and trends of corruption and corrupt practices, proposing effective countermeasures and best practices for the prevention, detection and sanctioning of corruption risks and corruption types (...)”*

- To **present** current efforts in anti-corruption education and the shaping of social attitudes towards corruption in public education: to explore how corruption prevention is included in school curricula and pedagogical practice.
- To **examine the integration of anti-corruption educational processes between higher education and the public sector**: to explore what kinds of programmes, courses, workshops or seminars have been launched.
- To **explore** anti-corruption educational processes in the public sector and the economic sector: to examine the possibilities available in these sectors for identifying and preventing corruption.
- To **identify** the educational and social awareness initiatives, courses and programmes of leading institutions participating in the prevention of corruption and the reinforcement of integrity.
- **To elaborate recommendations** at different levels of education and for the development of existing programmes and training courses in the public and economic sectors, in order to increase the efficiency of shaping social attitudes toward corruption and education.

Source: KEMCS Compilation by the KEMCS Secretariat

## 1.2 Methodology of the thematic report

The methodology of the thematic report is based on a wide exploration of sources, involving several levels, so that it presents the examined phenomenon in its normative, institutional and practical dimensions alike. The foundation of the thematic report was provided by a comprehensive legislative analysis and a thorough literature review, which covered the relevant national and international standards and a review of the scientific papers on corruption prevention and integrity development. This was complemented by a targeted review of international standards, in particular as regards the recommendations and guidelines from the United Nations (“UN”), the Organisation for Economic Co-operation and Development (“OECD”), the Council of Europe, and the European Union (“EU” or “Union”).

### ***Defining education***

A planned and organised learning process the purpose of which is to develop knowledge, skills and competencies, and may include formal (study at educational institutions) and non-formal (training courses, workshops etc. at workplaces) and/or informal (self-study, community programmes etc.) educational forms.

Source: OECD (2018): Education for Public Integrity Teaching on Anti-Corruption. Values and the Rule of Law

Besides normative and theoretical framework, the thematic report was also underpinned by empirical data collection. Eight state institutions provided detailed quantitative data related to the functioning of integrity and social awareness programmes, which enabled a thorough comparative analysis of institutional practices.

**The thematic report is based on the structured processing of the data sent by the following institutions in December 2025:** Hungarian Competition Authority (“HCA”); Integrity Authority (“IA”); Public Procurement Authority (“PPAH”); National Tax and Customs Administration (“NTCA”); Directorate of Internal Audit and Integrity of the National Development Centre (“DIAI”) and the organisational units overseen by the Deputy State Secretary for Public Procurement Supervision (“DSS PPS”); National Protective Service (“NPS”) and the Hungarian Judicial Academy of the National Office for the Judiciary (“HJA NOJ”).

### ***Defining the shaping of social attitudes***

The alteration of attitudes and beliefs. Our attitudes determine the way we interact with the world, depending on how we see it. While our beliefs are essentially about the way we see the world, attitudes determine how we conduct ourselves in it. Beliefs and attitudes are influenced by the values that shape our conduct.

Source: UNPAN (2021): New Mindsets, Capacities and Competencies in the Public Sector to Promote Effective Governance for Sustainable Development

The data analysis was complemented by half-structured interviews,<sup>1</sup> which we conducted with some of the leading experts of integrity-promoting education and the shaping of social attitudes, to explore the experiences and challenges of the practical implementation of programmes.

## 1.3 International standards

Of the standards set by international organisations, the thematic report focuses on the role of education and the shaping of social attitudes in corruption prevention, while presenting the international standards that lay down the key legal framework for Hungary. The role played by education and the shaping of social attitudes in preventing corruption and fostering a culture of integrity is frequently discussed by international organisations, especially the UN, OECD, the Council of Europe and the European Union.

**According to the consensus of international organisations, the prevention of corruption is inconceivable without educational and social awareness programmes that can effectively influence individuals' value choices and decision mechanisms.**

International standards clearly point out that a value-based education and the strengthening of social norms are key to sustainable anti-corruption efforts.

**However, this must not be restricted to state agencies: the application of a “whole of society” approach is a prerequisite for effective and long-lasting action against corruption.**

This means that the prevention of corruption and the reinforcement of a culture of integrity require all stakeholders of society – including state and local government institutions, economic operators, the civil society, the education system, as well as individuals – to take an active and coordinated role in these efforts.

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<sup>1</sup> Interview with Dr. Péter Klotz (NKE teacher; date: 18 November 2025); Interview with Dr. Péter Sükösd (President, Hungarian Compliance Society; date: 2 December 2025); Professional discussion with Miklós Ligeti (Transparency International Magyarország Alapítvány), dr. Orsolya Vince and Dorottya Lovász (K-Monitor Non-Profit Association) (Date: 13 January 2026); Professional discussion with the Corvinus University of Budapest (Date: 19 January 2026); Interview with Gabriella Hajnal (President, Klebelsberg Center; Date: 28 January 2026)

## 2. National context

The purpose of the national context is to provide a comprehensive picture of how the education of integrity and corruption prevention is incorporated in Hungary's public, economic and educational sectors, and what kind of role is taken by social communities in this field.

### 2.1 Education and the shaping of social attitudes in the public sector

In Hungary, the obligation of integrity and corruption prevention is incorporated in a multi-level regulatory framework. The most comprehensive framework is provided by Government Decision No 1025/2024 of 14 February 2024 on the implementation of the National Anti-Corruption Strategy, which stipulates the reinforcement of integrity-based functioning and the provision of integrity and corruption prevention training courses in the public sector as a strategic and implementation obligation for public administration bodies.

The government decrees governing the implementation of EU-funded programmes – in particular Government Decree No 272/2014 of 5 November 2014, Government Decree No 256/2021 of 18 May 2021 and Government Decree No 373/2022 of 30 September 2022 – lay down integrity, conflict of interest and fraud prevention requirements in relation to the protection of EU funds, and stipulate educational and awareness-raising obligations for the participants of the institutional system. At the statutory level, Section 29/B(3)(c) of Act CXXV of 2018 on Government Administration sets out measures for the prevention of conflicts of interest and for the provision of training to stakeholders involved in the use of European Union funds within the remit of the Directorate of Internal Audit and Integrity, thereby institutionalising integrity training.

Individual participation is specified by the civil service advanced training system. Pursuant to Act CXCIX of 2011 (Civil Servants Act) and Government Decree No 174/2011 of 31 August 2011, Government officials are obliged to participate in regular and documented advanced training, within the framework of which integrity and corruption prevention courses may also be required.

Hungarian institutions' commitment to fostering a culture of integrity is reflected in the widespread and regular integrity training that is provided in the country's public sector. At the same time, training programmes rely heavily on individual organisations' own experience and resources, which leads to methodological approaches that vary from institution to institution.

Based on the exploration of the situation in Hungary, two basic types of training, present in all institutions, can be identified: a compliance-based and a value-based approach. Compliance-based (i.e. rule-oriented) training courses provide a stable normative foundation, while value-based methods help navigate ethical dilemmas and solidify responsible decision-making.

**The current practice provides an adequate foundation for integrity-building. However, training programmes are currently dominated by the compliance-based approach.**

In line with international recommendations, a more conscious and accentuated integration of value-based, interactive and dilemma-oriented approaches may increase the efficiency of integrity training and help reinforce a culture of integrity in the entire public sector in the long run.

### 2.1.1 Intra-institutional training courses

#### ***Intra-institutional training courses – quick map***



**Focus:** mainly compliance-based, but the value-based (dilemma-oriented) approach is also present



**Target group:** new hires and existing employees



**Method:** new hires: 57% classroom-based; 43% mixed; existing employees: 64.7% classroom-based dominance; with 11.7% e-learning; 5.8% online; 17.6% mixed



**Mandatory/optional:** new hires: 89% mandatory; 11% optional; existing employees: 58.8% mandatory; 41.2% optional



**Regularity:** recurring training courses; ad hoc refreshers to stay abreast of legislative/methodological changes

Intra-institutional integrity training is widely available at and form an integral part of the operation of state agencies. Several institutions are operating consciously structured training systems serving the purpose of fostering a culture of integrity.

However, individual institutions' practice shows significant variation in terms of the number, the target groups and the mandatory/optional type of training courses. Programmes are primarily aimed at existing employees, while providing integrity training to new hires is less common.

The vast majority of training courses are provided in a classroom setting and are mandatory in several institutions. Although the use of digital and mixed training solutions is spreading rapidly, these cannot be regarded as general practice yet.

Table 2: The number and main characteristics of intra-institutional training courses

INSTITUTION	NUMBER OF INTERNAL TRAINING COURSES	NUMBER OF INTERNAL TRAINING COURSES		TRAINING METHODS (overall)	TYPE OF TRAINING (overall)
		TRAINING OF NEW HIRES	EXISTING EMPLOYEES		
Hungarian Competition Authority (HCA)	2	1	1	Classroom	Mandatory: 1
Integrity Authority (IAH)	3	-	3	Classroom	Mandatory: 2, Optional: 1
Public Procurement Authority (PPAH)	5	1	4	Classroom, e-learning, mixed	Mandatory: 4, Optional: 1
National Tax and Customs Administration (NTCA)	8	3	5	Classroom, online, mixed (classroom and e-learning)	Mandatory: 4, Optional: 1
Directorate for Internal Audit and Integrity (DIAI)	11	1	10	Classroom; e-learning; mixed	Mandatory: 4 (2 based on assignment), Optional: 6
Deputy State Secretary for Public Procurement Supervision (DSS PPS)	12	2	10	Classroom; e-learning; mixed	Mandatory: 8 (5 based on assignment), Optional: 2
National Protective Service (NPS)	1	-	1	Classroom	Optional: 1

Source: The KEMCS Secretariat's own compilation

## 2.1.2 Extra-institutional training courses

### **Extra-institutional training courses – quick map**



**Focus:** diverse – risk detection, conflict of interest, reporting mechanisms, public procurement, competition culture etc. Compliance-based is dominant, but value-based courses are also present.



**Target group:** public sector, education, economic sector



**Method:** 63.3% classroom; 13.3% e-learning; 6.6% online; 16.6% mixed



**Mandatory/optional:** 40% mandatory; 43.4% optional; 16.6% depending on organisation

Besides intra-institutional programmes, extra-institutional courses aimed at other organisations also play an important role in Hungary's integrity training system. Several state agencies play an active role in the organisation of such training courses that reach diverse target groups in the public sector and across economic operators and educational institutions.

The patterns of external training courses reveal that the public sector plays a leading role, while several institutions are providing integrity training for the participants of the educational sector. A lower percentage of the programmes are aimed at the economic sector, typically in special professional fields. Certain institutions provide external, cross-sectoral training in significant volumes.

The vast majority of external integrity training courses are held in a classroom setting, which favours interactive methods and fosters professional dialogue.

**Digital and mixed forms of training represent a lower share at present, but in line with international recommendations, further strengthening of these forms has great potential in increasing the availability and efficiency of training courses.**

Table 3: The number and main characteristics of extra-institutional training courses

INSTITUTION	EXTERNAL TRAINING COURSES TOTAL	FOR THE PUBLIC SECTOR	FOR THE ECONOMIC SECTOR	FOR THE EDUCATION SECTOR	TRAINING METHODS
HCA	1	-	-	1	Classroom
IAH	3	-	-	3	Classroom, mixed
PPAH	2	-	1	1	Classroom
NDC, DIAI	3	3	-	-	Classroom, mixed
NDC, DSS PPS	1	-	1	-	Mixed
NPS	20	10	3	7	Classroom, online, e-learning

Source: The KEMCS Secretariat's own compilation

### 2.1.3 Other social awareness activities in the public sector

In the public sector, the reinforcement of a culture of integrity takes place not only through formal training courses but via numerous complementary social awareness activities. The latter include communication and educational materials that institutions regularly prepare to present ethical operation and corruption prevention, such as in the form of guides, brochures and practical compendiums. Various online tools – websites, newsletters, podcasts, videos – are widely used to convey the principles of integrity to employees and a broader audience in an accessible way. Media coverage and communications campaigns also form part of the shaping of social attitudes. These raise the visibility of anti-corruption action and the significance of ethical conduct in civil service. Furthermore, several institutions are regularly organising conferences, professional forums and workshops which offer opportunities to present best practices and foster professional dialogue.

### 2.1.4 Cooperations in the public sector

Cooperation between state institutions plays a major role in fostering a culture of integrity and preventing corruption risks. Numerous contacts and forms of cooperation can be identified between institutions, and these are primarily related to training and social awareness activities.

These cooperations are typically bilateral and in line with specific institutions' professional profiles and competences. A significant part of the contacts are thematic or project-based, while systemic or methodological cooperations or cooperations involving multiple stakeholders are less prevalent.

Table 4: Cooperation matrix in education and the shaping of social attitudes

	DIAI	HCA	IAH	DSS PPS	PPAH	NTCA	NPS	Constitution Protection Office	Ministry of Interior	NKE University of Public Service
DIAI			There is training	Strong training	There is training	There is training	–	There is training	There is training	There is training
HCA	–		–	There is training	Strong training	–	–	–	–	–
IAH	There is training	–		–	Strong cooperation	–	–	–	–	There is training
DSS PPS	Strong training	There is training	–		–	There is training	–	There is training	–	–
PPAH	There is training	Strong cooperation	Strong cooperation	–		There is training	There is training, conference	–	–	There is training, strong cooperation
NTCA	There is training	–	–	There is training	There is training		–	There is training	–	–
NPS	–	–	–	–	There is training, conference	–		–	Strong professional consultation, training	–
Constitution Protection Office	There is training	–	–	There is training	–	There is training	There is training		–	–
Ministry of Interior	There is training	–	–	–	–	–	Strong training	–		–
NKE University of Public Service	There is training	–	There is training	–	There is training	–	Strong training	–	–	

Source: Compilation by the KEMCS Secretariat based on data provided by institutions<sup>2</sup>

<sup>2</sup> Note: The “–” mark does not denote a complete absence of contact between institutions; rather, it means that there is no identifiable, regular, or formalised cooperation between them, including cooperation specifically oriented toward training and the shaping of social attitudes. Ad hoc, legislation-based or informal contacts are outside the scope of this table.

## 2.2 Education and the shaping of social attitudes in the economic sector

The economic sector plays a key role in the prevention of corruption, which is also highlighted by the OECD Anti-Bribery Convention and the EU's anti-corruption guidelines. OECD recommendations clearly set out that companies must not only establish ethics and compliance policies, but also provide regular training for their employees on anti-bribery, the management of conflicts of interest, and ethical business practices. Based on international standards, training is a basic component of compliance systems, which contributes to maintaining fair competition and mitigating the legal risks involved in the operations of the company.

At EU level, Directive (EU) 2019/1937 fosters organisational integrity through establishing reporting channels, and the operation of these mechanisms requires adequate communication and training for employees. The OECD's guidelines on responsible business conduct also require multinational companies to integrate anti-corruption training in corporate compliance systems. Besides, the United Nations Global Compact lays down action against corruption as a principle, involving employees' awareness-raising on integrity and the support of training activities.

Decision 10/12, adopted at the conference of the state parties of the United Nations Convention against Corruption ("UNCAC"), expressly urges the competitive sector to develop compliance systems and introduce anti-corruption training programmes. As for international standards, the anti-bribery management system of ISO 37001 requires organisations to provide targeted and regular training to facilitate the understanding of anti-bribery rules and procedures. The primary objective of integrity training in the economic sector is to foster ethical corporate behaviour, decrease corruption risks, and contribute to a transparent and fair business environment. Training contents include the prohibition of bribery, the management of conflict of interest, the functioning of reporting mechanisms, and the promotion of ethical business practices.

**At the level of corporate decision-making and organisational culture, the reinforcement of integrity is a long-term process – one in which training is a priority instrument.**

## 2.3 The role of civil society communities and the media in education and the shaping of social attitudes

Civil society and the media are indispensable participants of the reinforcement of an anti-corruption culture, which the UNCAC also highlights by requiring their involvement in prevention and education. Civil communities contribute to decreasing society's tolerance toward corruption and strengthening the norms of ethical conduct. These communities raise citizens' awareness and promote active citizen engagement through various programmes, campaigns, and community initiatives. One of the key responsibilities of civil society is to make information related to the phenomenon of corruption and legal remedies accessible in an easy-to-understand form.

Civil society initiatives often promote the mastery of integrity standards through interactive formats, such as workshops, school presentations, and youth projects. In this process, the media acts as the main information channel of democratic public discourse, responsible for identifying and presenting corruption risks. Through its role as a “watchdog”, the press holds the institutions of public life to account, contributing to transparency and accountability. Enhancing media awareness is key to increasing social resilience, as it helps identify manipulation and disinformation. Civil society communities and the media make it possible for anti-corruption messages to reach wide social groups. These kinds of cooperation increase willingness to report, as they raise stakeholders’ awareness of and trust in the functioning of signalling mechanisms.

Civil society and media initiatives contribute to the adaptation of public institutions to transparency and the reinforcement of integrity. These participants also support social control through their research and monitoring, exploring the risks and deficiencies in the use of public funds. It is also part of the responsibility of the media to foster transparency and the reinforcement of public trust by publishing public interest data. Civil society’s activities aimed at shaping social attitudes strengthen citizens’ legal awareness, which is a basic condition for combating corruption.

The strengthening of community participation has become one of the key elements of anti-corruption culture. Civil society communities often play an intermediary role between citizens and state institutions, facilitating dialogue and the channelling of feedback. Information transmitted by the media helps society to recognise the damaging effects of corruption and adopt a more conscious attitude toward the processes in public life.

The activities of civil society actors collectively contribute to the establishment of a social environment in which the value of integrity becomes a self-evident norm. The prevention of corruption cannot be achieved through legal means alone, but requires public awareness-raising and education.

Civil communities are essential partners in education and the shaping of social attitudes, without which no corruption-resilient society can be created sustainably in the long term. Civil communities contribute accessible educational materials, interactive programmes, and campaigns aimed at shaping social attitudes to presenting integrity as a social value, while the fact-finding and analytic roles of the media fulfil strong control functions.

**Nevertheless, these initiatives join the Government’s integrity-building instruments typically via informal or project-like connections, which means that more conscious and structured collaborations have great potential for further development.**

## 2.4 Role of the education sector in the shaping of social attitudes

The education system plays a key role in the long-term development of a culture of integrity and social resilience to corruption, since the transmission of ethical norms and social values lays the foundations for law-abiding behaviour and commitment to the principle of the public good already in childhood. In public education, contents related to integrity appear within the framework of the National Core Curriculum (NAT), primarily through the subject of ethics and development focuses on social norms, self-discipline, cooperation and social responsibility. These provide an important foundation but currently do not form a solid integrity education system across various age groups, and ethics content is included in different subjects in a rather fragmented manner.

The role of teachers is decisive because the efficiency of integrity education greatly depends on teachers' competence, methodological repertoire and whether they can support students' development through a dilemma-oriented and value-based approach. At present, the inclusion of integrity and corruption prevention themes in teacher training and advanced training is limited, despite international standards indicating that this is one of the conditions for establishing a sustainable culture of integrity.

In higher education, several institutions already attribute strategic importance to integrity, and raise students' awareness, introducing courses on ethical issues, the responsible management of public funds, the rule of law or a compliance-oriented approach. Certain universities – such as the Corvinus University of Budapest – apply curricula built on the study of context-dependent ethical dilemmas, the application of case studies, and the integration of international standards, promoting students' critical thinking and developing their decision-making skills.

**At national level, however, there is no conscious, coordinated development, and the application of methodological innovations (e.g. interactive, value-based education, simulations or project-based learning) is not coherent.**

The public and higher education systems have a significant, partially untapped potential for the fostering of a culture of integrity and corruption prevention.

**The establishment of a national integrity education framework could support more effective leveraging of this potential. Such a framework would transcend age groups, set out the principles of value-based development, and ensure that training curricula, teacher training programmes and methodological tools are developed in a coherent way.**

The introduction of case-based, dilemma-oriented education on a wider scale would be particularly important, which – according to international experience – is very efficient in improving ethical sensitivity, critical thinking, and responsible decision-making.

## 2.5 Harmonising approaches and experiences in the shaping of social attitudes

The activity of the institutions and organisations presented in the thematic report serves to strengthen organisational and social integrity. State programmes are built on stable, long-term training infrastructure, uniform standards and institutional experience, ensuring durable integration of knowledge and wide accessibility.

By contrast, the programmes of the business and civil sectors apply a more flexible and project-based approach, respond rapidly to the changing environment, and use innovative methods to reach their target groups. These initiatives effectively support the practical and socially relevant promotion of integrity-oriented thinking.

*Table 5: Complementary roles and synergies of project-based and long-term programmes in education and the shaping of social attitudes intended to prevent corruption risks*

ASPECT	PROJECT-BASED PROGRAMMES	LONG-TERM PROGRAMMES	SYNERGY
Responsiveness	Rapid response	Stable, long-term planning	Innovation and embeddedness
Mode of operation	Project-like, adaptable	Institutionalised	Pilot gets into system
Methodological adaptability	Innovative, game-based	Uniform standard	Dissemination of new methods
Target group reach	Targeted, quick	National network	Targeted and wide coverage
Content development	Adds pedagogical value	Credible, data-based	Realistic and credible
Social embeddedness	Community connections	Institutional legitimacy	Mutual trust
Innovation	Fast experimentation	Structured integration	Flow of innovation into the system
Sustainability	Periodic projects	Long-term maintenance	From pilot to national model
Type of professional expertise	Competence in social trends	Regulatory and institutional competence	Complementary competence

Source: *Compilation by the KEMCS Secretariat*

Experience shows that the diverse strengths of different sectors complement each other: while the public sector provides a long-term framework and uniform standards, business actors and civil society contribute to innovation, methodological renewal and targeted interventions.

**The deliberate integration of these approaches creates a synergy that ensures that integrity development is seen not only as a formal requirement but also as a living, socially embedded process across the public and economic sectors and society as a whole.**

### 3. International examples and lessons

Based on international experience, integrity and anti-corruption education offers various effective approaches.

- In Finland, systemic and value-based integrity development is woven into curricula from early childhood to secondary school, while teachers' autonomy and continuous advanced training ensure consistent transmission of ethical conduct.
- In Hong Kong, the anti-corruption authority's "three pillars" strategy, built on investigation, prevention and education, strengthens the effectiveness of integrity programmes through the application of integrated collaborations between the public and private sectors, e-learning tools, and a regional network.
- In Vietnam, the fostering of anti-corruption attitudes among youth is based primarily on civil society initiatives. The FACE (For A Clean Education) programme invites students to university and secondary school clubs and encourages them to reveal corrupt practices in education and work out proposals for strengthening transparency. The "Transparent School" project builds on students' active participation and aims to promote the education of a generation committed to integrity in the long term.
- Latvia placed the main emphasis on regular, measurement-based integrity-development in the public sector. Building on knowledge-level assessments, the anti-corruption authority (KNAB) develops training programmes for civil service officials, ensuring the consistency of standards and the systematic reduction of risks.
- In Australia, integrity development concentrates on shaping organisational culture and everyday patterns of behaviour. The Australian Tax Authority's programme called "One Habit at a Time" integrates ethical conduct into work interactively – in small steps, strengthening accountability at both managerial and employee levels.
- In the United States, the Ministry of Justice provides the framework for integrity training in the economic sector. The model is risk-based and job-specific and requires regular refresher courses, which form part of an effective compliance system and also provide relevant assessment criteria for the determination of legal consequences.
- In Germany, integrity in the economic sector is promoted by an initiative of the Alliance for Integrity, which is supported by the federal government. The initiative offers practical sector-specific compliance and corruption prevention training courses for companies, especially small and medium-sized enterprises.

**For Hungary, based on international experience, the following development options emerge: systemic, value-based integration of integrity development into education from early childhood through secondary school, strengthening cross-curricular integrity development, extending institutional collaborations between the public and the private sector, establishing national standardised measurement and follow-up systems and introducing detailed role- and sector-specific compliance guides.**

# 4. Proposals by the Anti-Corruption Task Force

The proposals of the thematic report were outlined in three sequential timeframes. Short-term proposals include readily applicable instruments and interventions for the further development of existing practices. Medium-term proposals already focus on the gradual introduction of a comprehensive, uniform system which ensures coherence and sustainability across the measures. Long-term proposals are intended to consolidate, maintain and continuously develop the established system, with particular emphasis on monitoring, evaluation and ensuring adaptability.

## SHORT-TERM PROPOSALS (1-2 YEARS)

### A) Public sector

1. Introduction of a mandatory **basic integrity training** with a uniform minimum content for all new hires. The training should be built on training experience and best practices available at national institutions. The uniform minimum requirements could be fulfilled flexibly – through a uniform e-learning foundation module, value-based training or a combination of these – taking into consideration individual sectors' (public administration, local authorities, law enforcement) operational peculiarities. The proposal places an emphasis on raising awareness on integrity and the creation of a uniform framework of basic concepts. It is advisable to apply solutions that provide feedback (self-evaluation questions, modules indicating completion rates) and certify participation without distracting the focus from value-based learning.
2. It is important to identify high risk jobs in specific institutions – beyond managers and their advisors – and prepare **training plans adapted to the jobs' risk exposure**.
3. An **accessible, coordinated communication** of integrity governance to employees both in the entire public sector and at institutional level.
4. Continued **update and expansion** of training offerings with new knowledge and methodological approaches based on already introduced curricula and feedback from stakeholders, in order to increase the effectiveness of the training system. Within this framework, introducing easy-to-launch and easy-to-access **micro-learning materials** on ethical dilemmas and reporting situations for those working in the public sector.
5. Formalising and regularising **professional consultation and exchange of experience** among institutions involved in integrity training and the shaping of social attitudes in the public sector.

## B) The economic sector

7. Supporting **integrity programmes** and ethical training courses of **economic advocacy groups**, cooperation among professional organisations and chamber organisation and the introduction of best practices.
8. For small and medium-sized enterprises, introducing quickly accessible, online **integrity checklists** that support self-evaluation and are built on legal and professional requirements and guidelines, using relevant awareness-raising campaigns and information materials.

## C) Public and higher education

9. **Setting up an expert working committee** to explore ways to consolidate the current elements of integrity and ethics education in the elementary and secondary school education into a coherent, cross-curricular training programme across age groups, which is adapted to the existing curricular framework, supports students' integrity training in a uniform approach, and uses innovative methods from preschool age to the end of secondary school.
10. Introducing integrity-oriented curricular elements **in secondary schools**, primarily within the content framework of the subjects.
11. Besides previously introduced teaching materials, **disseminating** additional facts-based, accessible **information materials** among young people and teachers.
12. **Providing a budgetary grant framework** for innovative integrity and ethics educational programmes, national academic competitions, stipulating transparent evaluation criteria and a proportional impact-assessment obligation.

## MEDIUM-TERM PROPOSALS (3–5 YEARS)

### A) Cross-sectoral recommendation

13. Establishing a **strategic and methodological centre** with adequate powers and funds to integrate programmes relevant to the public, business and education sectors, plans and coordinates tasks related to education and the shaping of social attitudes, serving to strengthen integrity.

### B) Public sector

14. Involving an **integrity advisory network** and – drawing on relevant experience – compliance advisors working at state-owned economic enterprises in integrity training development, a coordinated, cross-sectoral collection, processing and integration of their feedback into teaching materials and the development of awareness-raising initiatives.
15. **Providing professional support and incentives** for the preparation of adaptable curricula and training courses by specific public institutions, built on central training courses, regularising knowledge sharing among institutions and between institutions and sectors, in particular as regards digital and other innovations supporting the management of integrity risks.
16. Introducing a mandatory integrity module in **public administration talent development programmes**.

17. Setting up an easy-to-access **online knowledge-sharing platform** for public administration professionals, with a central feature: a cross-sectoral online collection of integrity case studies presenting anonymised real-life corruption cases and discussing lessons learned and practical implications.

### C) The economic sector

18. **Introducing an ESG integrity component:** including measurable integrity indicators in corporate reports, which will also cover training provided to employees.

19. Working out the **risk-proportionate integrity minimums mandatory in the supplier chain** (code of ethics, conflict management process, integrity training) and state-level instruments incentivising their introduction.

20. Creating an **online professional support platform** with the participation of alliances, chambers, large enterprises and relevant state actors.

21. **Setting up** a sector-specific, continually upgraded **training structure**, adapted to risks and operational peculiarities, operated in a cooperation between the state and chambers, and tailored to existing corporate compliance and integrated risk management systems.

22. Stipulating **integrity training that is aimed at decreasing corruption risks** at project launch or at an early stage of the implementation of **investments and projects** funded by the EU or from the central budget, above a specified value or risk level.

### D) Public and higher education

23. Working out and gradually introducing a uniform **integrity-oriented curricular model** from kindergarten through secondary school. The focal point of the model would be culture- and project-based learning strengthening ethical autonomy, moral decision models and the encouragement of critical thinking and social participation to strengthen integrity.

24. Cross-curricular placement of **integrity-related contents**, connecting history, digital culture and civics.

25. **Incorporating** integrity-related knowledge and pedagogical methodologies in teacher training and advanced training.

26. Supporting extracurricular activities and **integrity-oriented projects and competitions in public and higher education, applying alternative pedagogical methods**; encouraging the sharing of best practices and examples.

27. Professional coordination and support for **integrity programmes** that are **not centrally prescribed but under the autonomous professional oversight** by educational institutions which adopt and adapt them to their own environments.

## LONG-TERM PROPOSALS (5+ YEARS)

### A) Cross-sectoral recommendations

**28.** Adopting a strategy for **integrity education and the shaping of social attitudes towards integrity**, as part of the National Anti-Corruption Strategy. The education strategy is a separate document that sets clear objectives and priorities and is built on evidence-based problem analysis. Its adoption is preceded by wide public consultation and the involvement of relevant institutions and organisations, it is implemented on the basis of a transparent and accountable plan and its implementation is followed up through a monitoring and evaluation system.

**29. Establishing long-lasting cooperation structures** in integrity education and in the shaping of social attitudes among the institutions of the public sector, the education system and all other social stakeholders.

### B) Public sector

**30.** The **complete integration of integrity management into the functioning of the public sector and the introduction of an integrated and uniform integrity training system**. The training system builds and further strengthens civil service values and integrity norms through targeted curriculum development, the continued and coordinated training of civil servants, institutional and government-level cooperation, the awareness-raising and prevention of behavioural risks, as well as development based on regular assessment and feedback.

### C) The economic sector

**31.** The creation of an **integrity development model based on state and corporate cooperation**, the regular and formalised involvement of public administration experts into the economic sector's compliance training programmes.

**32.** The institutionalised support of **technological innovations to strengthen integrity** (e.g. in AI-based risk analysis and integrity-supporting automatic mechanisms).

**33.** Supporting **corporate compliance training and the regular development of ethics frameworks** based on professional recommendations and standardised guides from public institutions.

### D) Public and higher education

**34.** **Continued renewal and quality assurance of an integrity-oriented educational model**, as well as its periodic review and methodological upgrade based on experiences.

**35.** Supporting **interdisciplinary courses and research** related to integrity in higher education.

**36.** Introducing **annual advanced ethics training** for educators and higher education teachers, promoting the exchange of professional experience.

**37.** **Introducing adult education programmes** related to integrity (use of public funds, transparency, law enforcement).

**MONITORING OF THE  
IMPLEMENTATION OF  
THE PROPOSALS SET  
OUT IN THE 2022 AND  
2023 REPORTS**

PART 3

# Introduction

In accordance with Section 50(1)(c) of Act XXVII of 2022 on the control of the use of European Union budget funds (“Integrity Authority Act”), the Anti-Corruption Task Force (“KEMCS” or “Task Force”) is tasked with examining the ways in which the proposals previously formulated by the Task Force have been taken into consideration in the development and implementation of legislative and non-legislative measures, as well as in government policies, and with assessing the outcomes of their implementation.<sup>1</sup>

Pursuant to Section 51(1) of the Integrity Authority Act and Section 5 of the Rules of Procedure adopted by KEMCS Decision No 18/2025 of 4 November 2025, the Task Force shall prepare an annual report by 15 March of the year following the year under review. Mandatory content elements of the annual report include a summary of the activities of the Task Force carried out during the year under review, a presentation of all adopted thematic reports and proposals, and the monitoring of the implementation of previously formulated recommendations.

The presentation of the status of implementation is based on data supplied by KEMCS members, as well as on publicly accessible legal and institution documents – including, specifically, legislation, government decisions, decrees, reports, action plans, and methodological guides – taking into account the Government’s official responses to the Task Force’s proposals.<sup>2</sup> The monitoring of the implementation of the proposals emphasises the scheduling of implementation, the clarity of responsibilities, and the achieved policy and institutional outcomes.

In 2022 and 2023<sup>3</sup>, the Anti-Corruption Task Force carried out its activities under several sub-task forces.

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<sup>1</sup> Section 50(1)(c) of the Integrity Authority Act stipulates that the Task Force is tasked with “preparing, on the basis of the tasks set out in points a) and b), an annual report, distinct from the annual analytical integrity report by the Authority; analysing the risks and trends of corruption and corrupt practices; proposing effective countermeasures and best practices for the prevention, detection and sanctioning of corruption risks and corruption types; and assessing their effective implementation, as well as how its previous proposals were followed up and implemented in relevant legislative and non-legislative initiatives and government programmes.

<sup>2</sup> Access the documents titled “The Government’s Response” at the following links: Responses to the proposals set out in the 2022 Report: <https://kemcs.hu/wp-content/uploads/2023/06/kormany-valasz-kemcs-jelentesre-2023.pdf> (5 January 2026); Responses to the proposals set out in the 2023 Report: <https://kemcs.hu/wp-content/uploads/2024/06/A-Kormany-valasza-a-2023-as-evre-vonatkozo-jelentesre.pdf> (5 January 2026)

<sup>3</sup> The Anti-Corruption Task Force did not adopt a report for the year 2024. [https://kemcs.hu/wp-content/uploads/2025/05/KEMCS\\_2024\\_eves\\_jelentestervezet\\_kormanyzati-oldal.pdf](https://kemcs.hu/wp-content/uploads/2025/05/KEMCS_2024_eves_jelentestervezet_kormanyzati-oldal.pdf) (5 January 2026); [https://kemcs.hu/wp-content/uploads/2025/05/KEMCS\\_2024\\_eves\\_jelentestervezet\\_civil-oldal.pdf](https://kemcs.hu/wp-content/uploads/2025/05/KEMCS_2024_eves_jelentestervezet_civil-oldal.pdf) (5 January 2026)

Table 1: Sub-task forces operating under the Task Force between 2023 and 2024

2023	2024
Public Procurement Sub-Task Force	Public Funds Sub-Task Force
EU and National Funding Programmes Sub-Task Force	
Sub-Task Force for Public Availability of Public Data and Transparency	Transparency and Ethics Sub-Task Force
Criminal and Criminal Proceedings Sub-Task Force	Anti-Corruption Sub-Task Force
Procedural and Monitoring Sub-Task Force	Coordination Sub-Task Force

Source: *Renewing KEMCS operations. Summary report.*<sup>4</sup>

These sub-task forces were dissolved by Decision No 12/2025 of 18 September 2025. Therefore, the 2025 Report no longer contains a breakdown by sub-task forces. As a progressive outcome of the Task Force's activities in the previous year, it can be assessed that the reports adopted for 2022 and 2023 have substantively influenced the development and implementation of the Government's anti-corruption measures (Annexes A and B).

<sup>4</sup> Renewing KEMCS operations Summary report. [https://kemcs.hu/wp-content/uploads/2025/09/KEMCS\\_felulvizsgalat\\_jelentes.pdf](https://kemcs.hu/wp-content/uploads/2025/09/KEMCS_felulvizsgalat_jelentes.pdf) (5 January 2026)

# 1. Implementation of the Proposals set out in the 2022 Report

## 1.1 Overview of the Implementation of the 2022 Proposals

The status of the implementation of the proposals for the year 2022 as of 31 December 2025 is set out in Annex A. The 2022 Report contained a total of 42 proposals. Of these, the Government fully supported 32 proposals, partially supported 2, and did not support 8.

These 42 proposals are formulated along mutually reinforcing measures in the areas of public procurement, EU and national funding programmes, access to public data, and criminal law instruments.

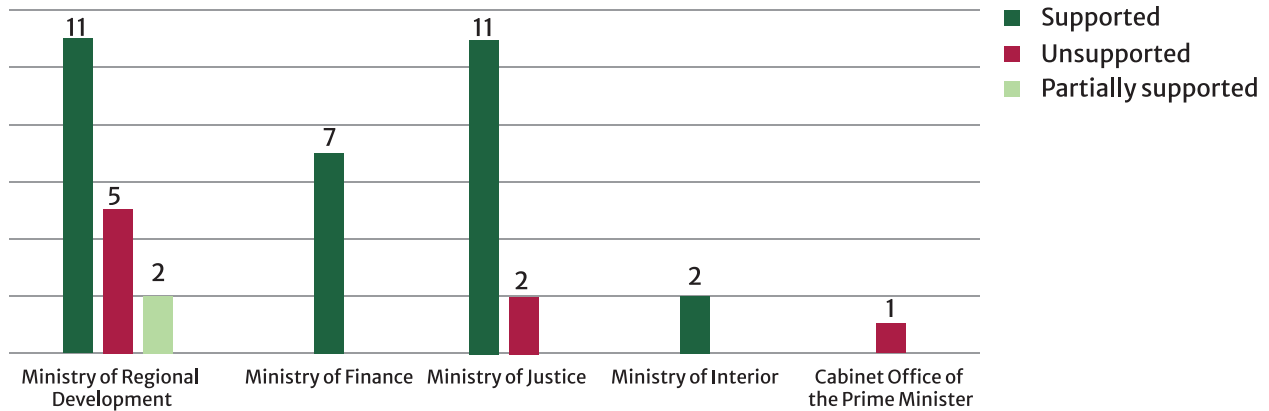
- **Public procurement:** the proposals promote the development of new guides with a standardised approach, especially taking into account the predictability of law application and the engagement of market participants. According to the recommendations, it is warranted to strengthen the practice of market consultations and to improve the accessibility and transparency of public procurement documents. A key objective is the targeted training and capacity building of small and medium-sized enterprises to facilitate their meaningful participation in procedures and to ensure a substantial reduction in the proportion of procedures with one submitted tender.

- **EU and national funding programmes:** their proposal emphasises the strengthening of control mechanisms, the administrative simplification of implementation, and the consistent application of a risk-based approach. The proposal urges the regular integration of risk assessments from programme planning to implementation, facilitating the prevention of abuse and the more efficient use of resources.

- **Public availability of public data and transparency:** according to the recommendations in this field, it is warranted to conduct a comprehensive review of judicial practices and data disclosure procedures, with particular regard to their timeliness and their actual implementation. Furthermore, the proposal aims to strengthen the transparency and verifiability of asset declaration systems as a fundamental tool of accountability.

- **Criminal law, criminal proceedings:** in this area, the proposals aim to expand the scope of asset accumulation investigations, strengthen prevention at a societal level, and ensure a more coherent integration of EU control obligations. Furthermore, the proposals consider it necessary to refine the statistics and conceptual frameworks related to corruption cases, which is essential for underpinning sound policy-making and for measuring the impact of the measures.

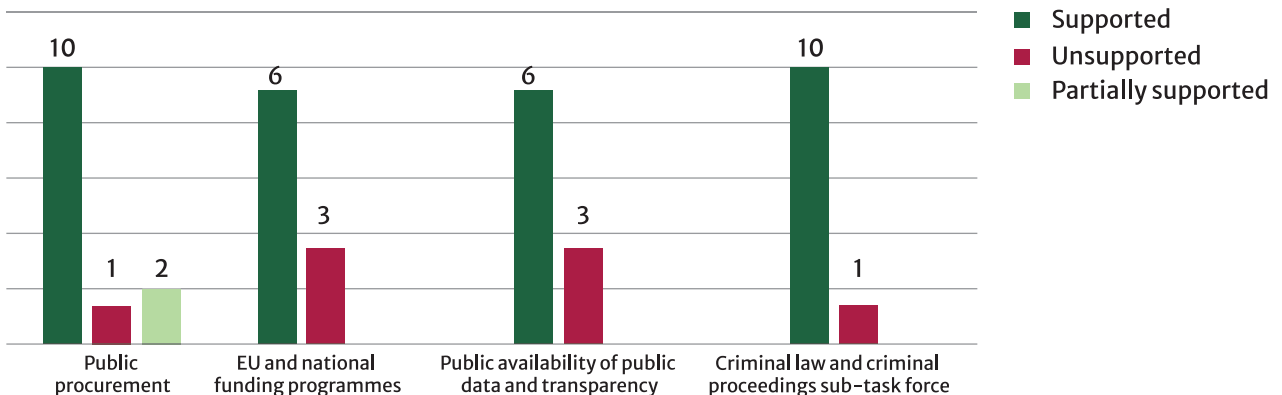
Figure 1: The Government's response to the proposals set out in the 2022 KEMCS Report broken down by competent state agency



Source: Compilation by the KEMCS Secretariat

The Government's responses show that there are differences among individual state agencies in the number of supported proposals (Figure 1). The vast majority of proposals fell within the duties and responsibilities of the Ministry of Regional Development and the Ministry of Justice, both of which exhibited an exceptionally high proportion of recommendations supported by the Government. At the same time, partially supported and unsupported proposals also appeared in relation to the Ministry of Regional Development. By contrast, the Government granted full support exclusively to proposals falling within the scope of authority of the Ministry of Finance and the Ministry of Interior.

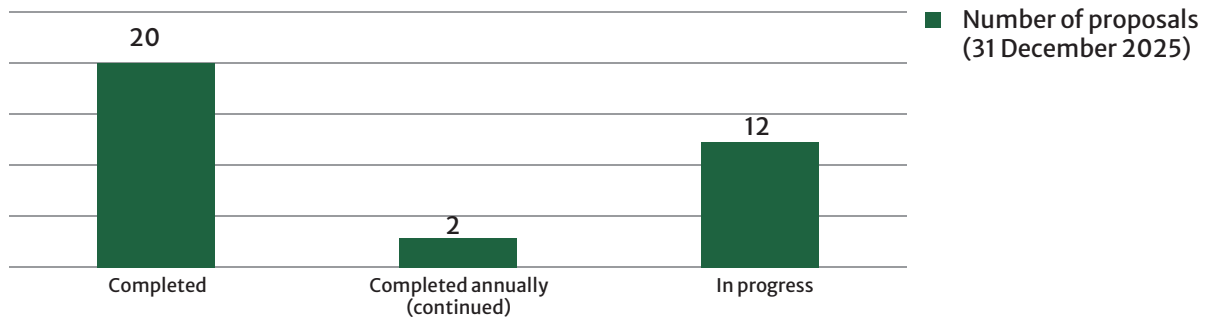
Figure 2: The Government's response to the proposals set out in the 2022 KEMCS Report broken down by sub-task force



Source: Compilation by the KEMCS Secretariat

The level of Government support varied across the policy areas covered by the individual sub-task forces (Figure 2). The vast majority of proposals put forward by sub-task forces on public procurement and on criminal law and criminal proceedings received Government support.

*Figure 3: Implementation of Proposals fully or partially supported by the Government as set out in the 2022 KEMCS Report<sup>5</sup>*



**Source:** *Compilation by the KEMCS Secretariat*

The Government implemented the recommendations of the Task Force in respect of the 16 proposals. The implementation of two proposals is ongoing, and therefore their progress is monitored on an annual basis. The implementation of four proposals, primarily focused on funding policy and the transparency of public data, is in progress as of 31 December 2025 (Table 2). These latter proposals cover two main areas: the system of EU and national funding programmes, and the public availability and transparency of data.

In 2022, KEMCS assigned tasks to itself on 12 occasions. Of these, five proposals were processed in detail in the 2023 report (Table A), while the further review of seven proposals will be carried out for future reports (Table 3). The implementation of these proposals is ongoing, with the Task Force intending to address them in future reports.

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<sup>5</sup> as of 31 December 2025. The monitoring of proposals fully or partially supported by the Government.

Table 2: Proposals and tasks carried out by KEMCS as set out in the 2023 Report

PROPOSAL	INTEGRATION OF THE PROPOSALS OF THE TASK FORCE IN THE 2023 REPORT
Review of the possible simplification of procedural rules	Results of the review of procedural rules and the possible directions of simplification are presented in subchapter 3.4.1.5 of the 2023 Report.
Review of compliance with reporting obligations toward the State Aid Monitoring Office	Proceedings concerning requests for public interest data and their disclosure are presented by the Task Force in subchapter 3.2.1.2 of the 2023 Report.
A review of contentious proceedings concerning the disclosure of public interest data – in which a central budgetary body participates as the defendant – in order to determine whether, depending on the court’s decision, the refusal to comply with the data request was necessary, justified, and lawful.	The Task Force to review contentious proceedings concerning the disclosure of public interest data, in which a central budgetary authority participates as the defendant, as presented in subchapter 3.2.1.3 of the 2023 Report.
Extending cooperation and dialogue among bodies involved in criminal proceedings to include citizens	The forms of cooperation are presented by the Task Force in subchapter 3.3.2 of the 2023 Report.
Control of the use of European Union budget funds	Analysed by the Task Force in subchapter 3.4.1.3 of the 2023 Report.

Source: Compilation by the KEMCS Secretariat based on the 2023 KEMCS Report<sup>6</sup>

<sup>6</sup> KEMCS: Report by the Anti-Corruption Task Force for the year 2023 March 2024 <https://kemcs.hu/wp-content/uploads/2024/03/KEMCS-2023-rol-szolo-eves-jelentes.pdf> (5 January 2026)

Table 3: Scheduled Proposals Relating to Subsequent Reports in the 2022 KEMCS Report

KEMCS PROPOSALON	IMPLEMENTATI	STATUS (As of 31 December 2025)
26. Acting on a civil society initiative, the sub-task force intends to examine the extent to which defining the term “high corruption”, commonly used in popular discourse, is necessary.	This was not examined in the Task Force’s 2023 Report.	<b>In progress</b>
27. Acting on a civil initiative, the sub-task force proposes considering the public disclosure of OLAF reports containing judicial recommendations, with the aim of assessing their (or certain parts thereof) suitability for transposition into anti-corruption (legal) practice.	This was not examined in the Task Force’s 2023 Report.	<b>In progress</b>
28. The sub-task force proposes carrying out research and investigations in the area of economic (business and civil society) corruption and formulating proposals based on the findings.	This was not examined in the Task Force’s 2023 Report.	<b>In progress</b>
29. A proposal to be added to next year’s plan of record of the sub-task force to review, among the cases subject to the reporting obligation within the prosecution service as regulated by Circular 1/2007 (ÜK. 3.) of the Prosecutor General, how many, between 2018 and 2022, qualified as high-priority offences under Section 817/A (1) of the Code of Criminal Procedure, relating to the exercise of public authority or the management of public assets.	This was not examined in the Task Force’s 2023 Report.	<b>In progress</b>

<p>30. Proposal intended to be added to next year's plan of record of the sub-task force: If the broader range of criminal offences under the Criminal Code that constitute corruption and corruption-related offences is defined, further investigation can be carried out to determine how many criminal proceedings were initiated in the past five years on suspicion of such offences, and to identify the specific corrupt behaviours contained in cases classified within the criminal statistics set for corruption.</p>	<p>This was not examined in the Task Force's 2023 Report.</p>	<p><b>In progress</b></p>
<p>31. Proposal intended to be added to next year's plan of record of the Task Force to review the conditions and regulatory framework currently applying to the management of national assets and assets managed by public trust funds exercising public functions and, based on these findings, to develop proposals to support expedient and responsible asset management.</p>	<p>This was not examined in the Task Force's 2023 Report.</p>	<p><b>In progress</b></p>
<p>32. The sub-task force proposes gathering information and conducting targeted research economic (business and civil society) corruption, based on which it would also formulate proposals for measures deemed necessary.</p>	<p>This was not examined int Task Force's 2023 Report.</p>	<p><b>In progress</b></p>

Source: *Compilation by the KEMCS Secretariat*

**During the implementation of the proposals, certain key legislative and enforcement tools can be repeatedly identified:**

- The provisions of **Act CXLIII of 2015 on public procurement** ("PPA") play a crucial role, especially the rules concerning preliminary market consultations – including Section 28(4) of the PPA – the regulations defining the frameworks of the system of redress (Section 150 of the PPA), as well as the rules concerning self-cleaning procedures and the transparency of reliability decisions (e.g. Section 187(2)).

- The implementation framework is meaningfully reinforced by **Government Decree No 63/2022 of 28 February 2022**, which sets out procedural and substantive tools to increase the intensity of competition in public procurement procedures, with particular focus on ensuring the possibility of submitting tenders for lots and eliminating overly restrictive eligibility and technical requirements.
- **Government Decision No 1118/2023 of 31 March 2023** specifically aims to reduce the proportion of public procurement procedures with one submitted tender and simultaneously determines the key focus areas for the monitoring of notices, especially the justification for omitting tenders for lots and the conditions for applying serial types. Furthermore, the Decision sets out the implementation tasks related to the further development of preliminary market consultations.
- **The implementation framework of the medium-term National Anti-Corruption Strategy is set out by Government Decision No. 1025/2024 of 14 February 2024**, which places particular emphasis on coordinating funding policy control mechanisms, assessing cumulations of funding, and reviewing reporting obligations to the State Aid Monitoring Office, with specific deadlines for implementation. The Decision assigns additional tasks concerning the digitalisation of the asset declaration system, the potential expansion of the group of obligors, and the establishment of the sanctions regime, in accordance with the normative basis for administrative and criminal law consequences.
- **Presidential communications and methodological guides issued by the Public Procurement Authority** – which facilitate the standardised practical application of the transparency and publicity requirements set out in the PPA – play a leading role in the management of public interest reports and compliance with disclosure obligations. In line with this, Government Decree No 53/2024 of 4 March 2024 allows for anonymous access to documents held in the EPPS as of December 2024, thereby establishing the technical and legal conditions for transparent access to procurement documents.
- The financial requirements for access to legal remedies are governed by amendments to **Act XCIII of 1990** (“Duties Act”), which, in accordance with the rules on legal remedies under the PPA, define the administrative service fees for proceedings before the Public Procurement Arbitration Board, with effect from 1 February 2024.
- The integration of sustainability aspects into public procurement is established by the designation of competences under **Government Decision No 1646/2022 of 22 December 2022**, facilitating the application of green public procurement and other horizontal requirements in procurement practice.

## 1.2 Proposals from the 2022 Report currently being implemented

The review of the implementation of proposals shows that a significant part of the measure package is already in an advanced stage of implementation. A total of 20 recommendations have been completely implemented, while two proposals are implemented on a continuous annual basis, integrating into relevant institutional and policy practice. The implementation of 12 proposals is still ongoing, with further measures required in these cases. Table 4 summarises the proposals whose implementation is still ongoing, presenting their status and the main challenges to their implementation.

Table 4: List of proposals currently being implemented

KEMCS PROPOSAL	STATUS OF IMPLEMENTATION (31 December 2025)
<b>PROPOSALS SUPPORTED BY THE GOVERNMENT</b>	
<b>PUBLIC PROCUREMENT</b>	
<p>4. Considering the Report’s finding that “with regard to successful lots, the proportion of contracts with one submitted tender reached 32.9% in EU procedures in 2022, while it stood at 20.1% in national procedures”, the Task Force calls on the bodies with oversight powers to ensure that the possibility to submit tenders for lots is assessed with particular care.</p>	<p><b>Completed</b></p> <p><b>Continuous on an annual basis</b> Bodies with oversight powers carried out the relevant verifications <b>on a continuous basis in 2023, in 2024 and in 2025</b> as well.</p>
<p>5. The Task Force requests the bodies with oversight powers to ensure that the review of specific serial types, overly restrictive eligibility requirements and award criteria is carried out with due diligence.</p>	<p><b>Completed</b></p> <p><b>Continuous on an annual basis</b> Bodies with oversight powers carried out the relevant verifications <b>on a continuous basis in 2023, in 2024 and in 2025</b> as well.</p>
<b>EU AND NATIONAL FUNDING PROGRAMMES</b>	
<p>11. An examination of which types of control actions applied to EU-funded grants could be incorporated into the domestic funding framework, with a view to strengthening the protection of public funds and reducing the risk of corruption.</p>	<p><b>Deadline: 30 June 2025</b></p> <p><b>In progress</b> The implementation of requests for legislative amendments and proposals may take place at a later stage. The related preparatory document is not public in accordance with Section 27(5) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.</p>

12. It is necessary to review whether the multi-level structure of organisations assisting in the administration and management of domestically funded support is justified.

**Deadline: 30 June 2025**

**In progress**

The implementation of requests for legislative amendments and proposals may take place at a later stage. The related preparatory document is not public in accordance with Section 27(5) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

14. In the case of grants provided from chapter-managed appropriations, the integration of the examination of cumulations of funding and methodology-based risk analysis into the domestic funding system could support the detection of irregularities (e.g. through control) and help reduce opportunities for corruption.

**Deadline: 30 June 2025**

**In progress**

The implementation of requests for legislative amendments and proposals may take place at a later stage. The related preparatory document is not public in accordance with Section 27(5) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

## **PUBLIC AVAILABILITY OF PUBLIC DATA AND TRANSPARENCY**

22. In order to further strengthen the transparency of asset declarations, an international (EU) comparison should be carried out of the proposals put forward by civil society actors, as detailed in Chapter 3.

**Deadline: 30 November 2025**

**In respect of investigation outcomes and proposals**

**In progress**

## **CRIMINAL LAW, CRIMINAL PROCEEDINGS**

23. With the involvement of the relevant bodies (Ministry of Finance, National Tax and Customs Administration), the sub-task force proposes, in the context of enhancing the effectiveness of corruption prevention, examining the possible extension of the scope of asset accumulation investigations to cases such as suspected bribery or influence peddling.

**This was not reviewed by the Task Force.**

**In progress**

<p>26. Acting on a civil society initiative, the sub-task force intends to examine the extent to which defining the term “high corruption”, commonly used in popular discourse, is necessary.</p>	<p><b>This was not reviewed by the Task Force.</b></p> <p><b>In progress</b></p>
<p>27. Acting on a civil society initiative, the sub-task force proposes considering the public disclosure of OLAF reports containing judicial recommendations, with the aim of assessing their (or certain parts thereof) suitability for transposition into anti-corruption (legal) practice.</p>	<p><b>This was not reviewed by the Task Force.</b></p> <p><b>In progress</b></p>
<p>28. The sub-task force proposes carrying out research and investigations in the area of economic (business and civil society) corruption and formulating proposals based on the findings.</p>	<p><b>This was not reviewed by the Task Force.</b></p> <p><b>In progress</b></p>
<p>29. Proposal intended to be added to the 2023 plan of record of the sub-task force to review, among the cases subject to the reporting obligation within the prosecution service as regulated by Circular 1/2007 (ÚK. 3.) of the Prosecutor General, how many, between 2018 and 2022, qualified as high-priority offences under Section 817/A (1) of the Code of Criminal Procedure, relating to the exercise of public authority or the management of public assets.</p>	<p><b>The Task Force added this among its proposals in its 2023 Report.</b></p> <p><b>In progress</b></p>

30. Proposal intended to be added to the 2023 plan of record of the sub-task force: If the broader range of criminal offences under the Criminal Code that constitute corruption and corruption-related offences is defined, further investigation can be carried out to determine how many criminal proceedings were initiated in the past five years on suspicion of such offences, and to identify the specific corrupt behaviours contained in cases classified within the criminal statistics set for corruption.

**The Task Force added this among its proposals in its 2023 Report.**

**In progress**

31. Proposal intended to be added to the sub-task force's 2023 plan of record to review the conditions and regulatory framework currently applying to the management of national assets and assets managed by public trust funds exercising public functions and, based on these findings, to develop proposals to support expedient and responsible asset management.

**The Task Force added this among its proposals in its 2023 Report.**

**In progress**

32. The sub-task force proposes gathering information and conducting targeted research on economic (business and civil society) corruption, based on which it would also formulate proposals for measures deemed necessary.

**The Task Force added this among its proposals in its 2023 Report.**

**In progress**

*Source: Compilation by the KEMCS Secretariat*

## 2. Implementation of the Proposals set out in the 2023 KEMCS Report

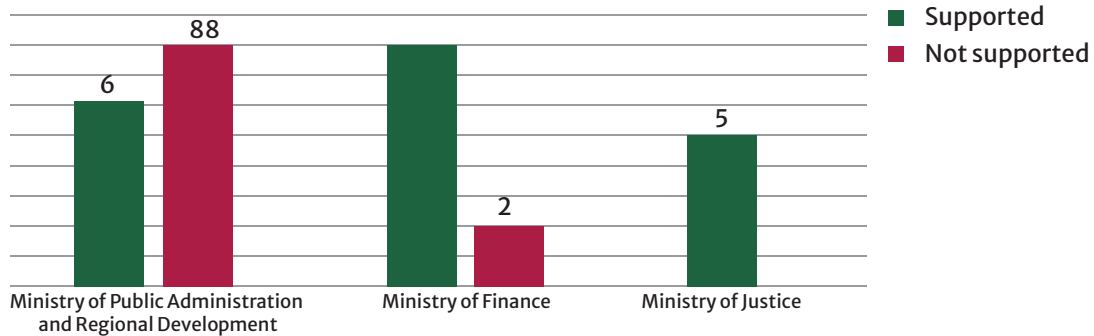
### 2.1 Overview of the Implementation of the 2023 Proposals

The status of the implementation of the proposals for the year 2023 as of 31 December 2025 is set out in Annex B. In 2023, the Anti-Corruption Task Force formulated a total of 29 proposals, 19 of which were supported by the Government, while 10 was not. Compared to the 2022 report, this indicates a decrease in the rate of support.

The proposals were directed at three main areas: public procurement, EU and national funding programmes, criminal law and criminal proceedings. In 2023, KEMCS formulated no proposals regarding the public availability and transparency of public data.

- **Public Procurement:** Most proposals are aimed at strengthening transparency and competition in public procurement procedures. This includes creating professional working groups to identify the reasons for procedures with one submitted tender, involving the Hungarian Competition Authority into sector-specific reviews, conducting practical assessments of the rotation of restricted procedures, boosting the participation of SMEs in centralised procurement, and reviewing the oversight of representation rules in review procedures and preliminary market consultations.
- **EU and National Funding Programmes:** The proposals are aimed at integrating EU control mechanisms into the domestic system, examining conflict of interest and guarantee requirements, collecting data on the involvement of external experts in audits, developing and streamlining funding systems, and applying monitoring and AI-based risk analysis in the future. The goal is to boost transparency, efficiency and risk management in funding processes.
- **Criminal Law, Criminal Proceedings:** The proposals are first and foremost analytical and investigative in nature: refining the concept of “high corruption”; conducting impact assessments of the potential disclosure of OLAF reports; researching economic corruption and corruption in civil society; reviewing policies on the management of public assets; and evaluating practical experiences in separate proceedings used in corruption cases.

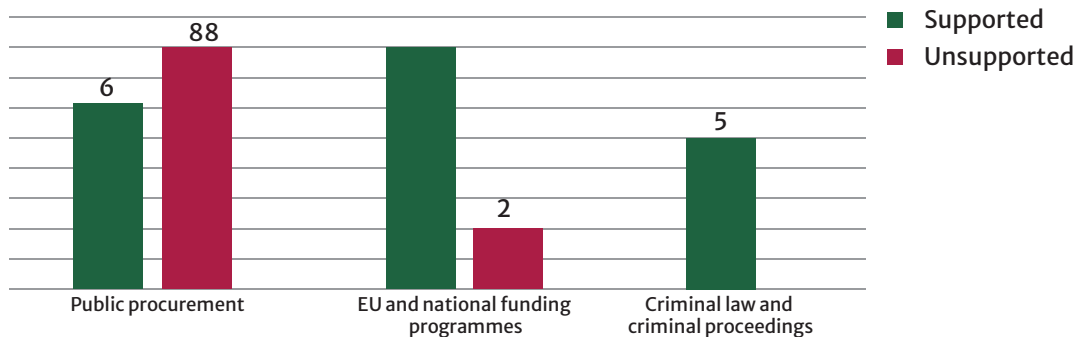
Figure 4: The Government's response to the proposals set out in the 2023 KEMCS Report broken down by competent state agency



Source: Compilation by the KEMCS Secretariat

Compared to 2022, the Government's responses to the proposals set out in the 2023 KEMCS Report show smaller differences among individual competent state agencies (Figure 4). The vast majority of proposals fell within the competence of the Ministry of Regional Development and the Ministry of Finance. The rate of government support is exceptionally high in the case of both the Ministry of Finance and the Ministry of Justice; in the case of the Ministry of Justice, all proposals are supported.

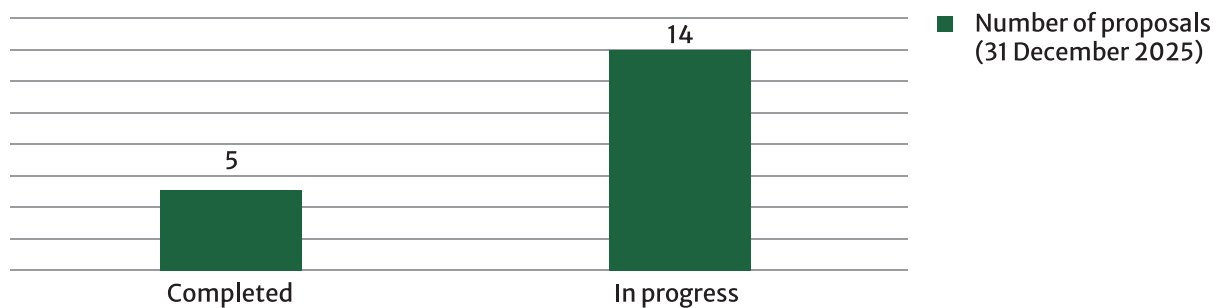
Figure 5: The Government's response to the proposals set out in the 2023 KEMCS Report by sub-task force



Source: Compilation by the KEMCS Secretariat

Of the 19 proposals examined, five have been fully implemented, while the implementation of 14 recommendations was still ongoing as of 31 December 2025 (Figure 6). The rate of implementation suggests that although government and institutional actors have made progress in the implementation of anti-corruption measures, most proposals of the Task Force require further actions that often necessitate the coordinated contribution from several stakeholders.

Figure 6: Implementation of Government-Supported Proposals set out in the 2023 KEMCS Report<sup>7</sup>



Forrás: KEMCS Titkárság összeállítása

In 2023, the Task Force defined tasks to be carried out within its own competence in 11 cases. The processing and professional evaluation of these proposals were scheduled by the body for a later date, with the understanding that their examination and presentation would take place in subsequent reports.

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<sup>7</sup> as of 31 December 2025. The monitoring of proposals fully or partially supported by the Government.

Table 5: Scheduled Proposals Related to Subsequent Reports in the 2023 KEMCS Report

DESCRIPTION OF KEMCS PROPOSAL	PROGRESS UP UNTIL 31 DECEMBER 2025
9. In 2024, data should be gathered on the number of cases in which external experts (e.g. auditors) were involved and on the proportion of all audits in which such involvement occurred.	<b>In progress</b>
10. An assessment of the further development of the National Support Scheme (OTR), based on which all domestic funding would be accessible through this system.	<b>In progress</b>
11. Proposal intended to be added to the sub-task force's 2024 plan of record: using artificial intelligence (AI) in the analysis of corruption risks, creating the foundations for AI-based machine solutions.	<b>In progress</b>
12. Proposal intended to be added to the sub-task force's 2024 plan of record: assessing the presentation of grant-writing organisations on application data sheets.	<b>In progress</b>
13. Proposal intended to be added to the sub-task force's 2024 plan of record: a time-series comparison of statistics on the number of audits with data from previous years (from 2024, the number and effectiveness of audits have actually increased).	<b>In progress</b>
14. Proposal intended to be added to the sub-task force's 2024 plan of record: assessing the possibility of monitoring committees in connection with domestic funding and the preparation of the introduction.	<b>In progress</b>
15. Acting on a civil society initiative, the sub-task force intends to examine the extent to which defining the concept of "high corruption", commonly used in popular discourse, is necessary.	<b>In progress</b>

<p>16. Acting on a civil society initiative, the sub-task force proposes considering the public disclosure of OLAF reports containing judicial recommendations, with the aim of assessing their (or certain parts thereof) suitability for transposition into anti-corruption (legal) practice.</p>	<p><b>In progress</b></p>
<p>17. The sub-task force proposes carrying out research and investigations in the area of economic (business and civil society) corruption and formulating proposals based on the findings.</p>	<p><b>In progress</b></p>
<p>18. A proposal to review the conditions and regulatory framework currently applying to the management of national assets and assets managed by public trust funds exercising public functions and, based on these findings, to develop proposals to support expedient and responsible asset management.</p>	<p><b>In progress</b></p>
<p>19. A proposal concerning the monitoring of the practical application of the legal institution for conducting separate proceedings in case of serious criminal offences related to the exercise of public authority or the management of public assets under Act CX of 2017 on the Code of Criminal Procedure, with particular regard to examining the reasons leading to the repeal of dismissive or termination decisions, in order to draw conclusions that can be useful for both legislation and the application of law.</p>	<p><b>In progress</b></p>

Source: *Compilation by the KEMCS Secretariat*

**During the implementation of the proposals, certain key legislative and enforcement tools can be repeatedly identified:**

- The most frequently cited legal and policy framework during the implementation of the proposals was provided by **Government Decision No 1082/2024 of 28 March 2024**. The primary objective of the Decision was to reduce the proportion of procedures with one submitted tender, with a particular focus on the health sector. To this end, the Government requested the Minister of Interior to establish, with the involvement of the Ministry of Public Administration and Regional Development, the relevant contracting authorities, and professional advocacy groups, a specialised working group tasked with formulating proposals to curb procedures with one submitted tender and drawing up regular reports on the progress of implementation.

– Public procurement procedures with one submitted tender are also addressed in the **2024–2025 Action Plan of the National Anti-Corruption Strategy**, which states that the proportion of such procedures had decreased in the health sector by 2024. In line with this, analysis between 2021 and 2023 by the Hungarian Competition Authority also identified a downward trend in certain markets, especially in the procurement of diagnostic imaging equipment. The annex to Government Decision No 1086/2025 of 31 March 2025 shows that the specialised working group has been set up.

– **Government Decision No 1082/2024 of 28 March 2024:**

- Point 5 of the Government Decision requested the president of the Hungarian Competition Authority to select three public procurement markets in which conducting sector-specific reviews is warranted and to disclose the selection criteria and the outcome of the reviews. Accordingly, the HCA designated three markets.

- In relation to Section 115 of Act CXLIII of 2015 on public procurement (PPA), Point 2(c) of Government Decision requested the Minister for Public Administration and Regional Development to review the mandatory rotation practice applied in restricted procedures and, if necessary, draw up an amendment proposal.

- As part of implementation, the preparation of the relevant legislative amendments has started.

– **Act LXIV of 2024** amended the PPA, once again enabling accredited public procurement consultants to act as representatives in proceedings before the Public Procurement Arbitration Board. The review of the requirements concerning public administration notices also started: the Ministry of Public Administration and Regional Development drew up the draft of the amendment to Decree No 44/2015 of 2 November 2015 of the Minister of the Prime Minister’s Office.

## 2.2 Proposals from the 2023 Report currently being implemented

Based on the review of the implementation of proposals, it can be established that five of a total of 19 recommendations was fully implemented, while the implementation of 14 proposals is still ongoing.

Table 6 summarises the proposals whose implementation is still ongoing, presenting their status and the main challenges to their implementation.

Table 6: List of proposals currently being implemented

KEMCS PROPOSAL	STATUS OF IMPLEMENTATION (31 DECEMBER 2025)
<b>PROPOSALS SUPPORTED BY THE GOVERNMENT</b>	
<b>PUBLIC PROCUREMENT</b>	
<p>1. Creation of a working group by the Ministry of Public Administration and Regional Development, engaging contracting authorities most and least involved in public procurement procedures with one submitted tender, as well as relevant professional advocacy groups of economic operators, in order to identify the reasons for the high proportion of such procedures and discuss procurement practices used across different subject areas.</p>	<p><b>In progress</b></p> <p>Point (c) Report published on <b>30 June 2026</b></p>
<b>EU AND NATIONAL FUNDING PROGRAMMES</b>	
<p>7. In the case of domestically funded grants, beneficiaries are required to submit declarations of conflict of interest at least at the time of signing the grant agreement.</p>	<p><b>Deadline: 30 June 2025</b></p> <p><b>In progress</b></p> <p>The implementation of requests and proposals for legislative amendments may take place at a later stage. In accordance with Section 27(5) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, the related preparatory document is not public.</p>
<p>8. Assessing the potential mandatory requirement of guarantees in the context of domestically funded grants.</p>	<p><b>Deadline: 30 June 2025</b></p> <p><b>In progress</b></p> <p>The implementation of requests and proposals for legislative amendments may take place at a later stage. In accordance with Section 27(5) of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, the related preparatory document is not public.</p>

9. In 2024, data should be gathered on the number of cases in which external experts (e.g. auditors) were involved and on the proportion of all audits in which such involvement occurred.

**In progress**

KEMCS will address the proposal in the relevant reports.

10. An assessment of the further development of the National Support Scheme (OTR), based on which all domestic funding would be accessible through this system.

**In progress**

KEMCS will address the proposal in the relevant reports.

11. Proposal intended to be added to the sub-task force's 2024 plan of record: using artificial intelligence (AI) in the analysis of corruption risks, creating the foundations for AI-based machine solutions.

**In progress**

KEMCS will address the proposal in the relevant reports.

12. Proposal intended to be added to the sub-task force's 2024 plan of record: assessing the presentation of grant-writing organisations on application data sheets.

**In progress**

KEMCS will address the proposal in the relevant reports.

13. Proposal intended to be added to the sub-task force's 2024 plan of record: a time-series comparison of statistics on the number of audits with data from previous years (from 2024, the number and effectiveness of audits have actually increased).

**In progress**

KEMCS will address the proposal in the relevant reports.

14. Proposal intended to be added to the sub-task force's 2024 plan of record: assessing the possibility of monitoring committees in connection with domestic funding and the preparation of the introduction.

**In progress**

KEMCS will address the proposal in the relevant reports.

## **CRIMINAL LAW, CRIMINAL PROCEEDINGS**

15. Acting on a civil society initiative, the sub-task force intends to examine the extent to which defining the concept of "high corruption", commonly used in popular discourse, is necessary.

**In progress**

KEMCS will address the proposal in the relevant reports.

16. Acting on a civil society initiative, the sub-task force proposes considering the public disclosure of OLAF reports containing judicial recommendations, with the aim of assessing their (or certain parts thereof) suitability for transposition into anti-corruption (legal) practice.

**In progress**

KEMCS will address the proposal in the relevant reports.

17. The sub-task force proposes carrying out research and investigations in the area of economic (business and civil society) corruption and formulating proposals based on the findings.

**In progress**

KEMCS will address the proposal in the relevant reports.

18. A proposal to review the conditions and regulatory framework currently applying to the management of national assets and assets managed by public trust funds exercising public functions and, based on these findings, to develop proposals to support expedient and responsible asset management.

**In progress**

KEMCS will address the proposal in the relevant reports.

19. A proposal concerning the monitoring of the practical application of the legal institution for conducting separate proceedings in cases of serious criminal offences related to the exercise of public authority or the management of public assets under Act CX of 2017 on the Code of Criminal Procedure, with particular regard to examining the reasons leading to the repeal of dismissive or termination decisions, in order to draw conclusions that can be useful for both legislation and the application of law.

**In progress**

KEMCS will address the proposal in the relevant reports.

Source: *Compilation by the KEMCS Secretariat*