

Report

Report by the Eligibility Committee, established in accordance with Act XXVII of 2022 on the control of the use of European Union budget funds, concerning the review of the functioning of the Integrity Authority and of the Board of the Integrity Authority

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I. Objective and Subject of the Report

- [1] Section 72 of Act XXVII of 2022 on the Control of the Use of European Union Budget Funds (hereinafter: Integrity Authority Act) requires the Eligibility Committee – established under Section 64 of the same Act – to review the operation of the Authority and the Authority’s Board two years after the appointment of the members of the Authority’s Board.
- [2] On the recommendation of the President of the State Audit Office, on 4 November 2022 the President of the Republic, by Decision No. 314/2002 (XI. 4.) of the President of the Republic, appointed Ferenc Bíró as President of the Integrity Authority, and Dr. Kálmán Dabóczi and Tímea Holbusz as Vice-Presidents of the Integrity Authority.
- [3] Section 70(2) of the Integrity Authority Act prescribed that the Authority’s Board hold its first meeting no later than 19 November 2022. The Board’s first meeting – in compliance with the statutory requirement – actually took place on 18 November.
- [4] Pursuant to Section 70(3), the Authority commenced full operation on 19 November 2022.
- [5] After the two-year period specified in Section 72, calculated from the date specified in Section 70 (3), the Eligibility Committee carried out the review of the operation of the Authority and of the Authority’s Board, the findings of which are summarised in this report.
- [6] In accordance with the above, the findings of this report relate to the period from the establishment of the Authority until 30 November 2024.
- [7] The review task defined in the Integrity Authority Act did not extend to the review of the establishment and operation of the Anti-Corruption Working Group; therefore, in this report, the Eligibility Committee did not assess the establishment and operation of the Anti-Corruption Working Group.
- [8] Acting within the scope of its independent advisory powers as defined in Section 64 of the Integrity Authority Act, the Eligibility Committee carried out its review-related task free from any external influence. In performing this task, the Committee cooperated, pursuant to Section 72 of the Integrity Authority Act, with the organisations specified in Part II on Methodology with regard to the development of the methodology of the report. The Eligibility Committee interpreted the cooperation and consultation with international organisations under Section 72 of the Integrity Authority Act as relating solely to the establishment of the methodological framework and as not applicable to determining the findings of the review.
- [9] The Integrity Authority Act provides no guidance to the Eligibility Committee as to the form in which it should summarise the findings made during the review. The Eligibility Committee interpreted this lack of regulation as indicating that the legislator entrusted it with determining the formal framework. In this situation, the Eligibility Committee decided to prepare a report on its findings.
- [10] In view of the fact that the Integrity Authority Act provides no guidance as to which

bodies the Eligibility Committee should address its findings to within the framework of the review, or whether to make these public, the Eligibility Committee, within the review, requested a position from the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: NAIH). When publishing this report on the findings made during the review, the Eligibility Committee acts in accordance with the position of the President of the NAIH when making this report public.

II. Methodology for Preparing the Report

- [11] The repeatedly cited applicable Section 72 of the Integrity Authority Act requires the Eligibility Committee to review the operation of the Authority and the Authority's Board after two years from the commencement of operation; however, the Act provides no detailed guidance to the Eligibility Committee either on the substantive elements of the review or on the methodology thereof and, therefore, it leaves such formulation to the Eligibility Committee. In view of the fact that the Act contains no restrictive provision regarding the content of the review, the Eligibility Committee strived for completeness in the course of the review, within which it examined the operation of the Authority and the Board on the basis of the methodology presented below.
- [12] At the same time, the review of operation did not cover the examination of the Authority's procedures, the evaluation of these in any form, or the review of the Board's decisions, in view of the fact that the Eligibility Committee is not a forum for legal remedy.
- [13] In developing the methodological framework of the review, the Eligibility Committee initiated cooperation with the following international organisations:
 - Organisation for Economic Co-operation and Development (OECD),
 - Transparency International,
 - International Anti-Corruption Academy (IACA).
- [14] In the course of preparing the report, the Eligibility Committee submitted written questions on multiple occasions, which it delivered directly to the President of the Authority (in person on 19 November 2024) and sent by email (on 7 February 2025, 14 February 2025, 18 March 2025 and 4 April 2025).
- [15] As a result of cooperation with international organisations during the preparation of the report, the Eligibility Committee's review was carried out on the basis of the methodology selected – recommended by the OECD and described below – which was followed, after multiple data requests and processing under the methodology, by interviews conducted with the following persons: President, Vice-Presidents, Director of Professional Affairs, Head of the Legal Office, Head of the Finance Office, HR and Strategy Director, the Internal Auditor, Head of the Investigation Office, Head of the Presidential Staff. In the course of the interviews, only questions concerning the operation of the organisation were reviewed, with regard to the individual procedures and investigations conducted by the Authority, the Eligibility Committee did not request information.

- [16] The Multilateral Organisation Performance Assessment Network (hereinafter: MOPAN) is an independent organisation operated by the OECD, which carries out evaluations of multilateral institutions. The MOPAN¹ framework is multidimensional and examines an institution's performance and impact across five performance areas. Four areas – strategic, operational, relationship and performance management – relate to organisational effectiveness, while the fifth reports on the achievement of results in relation to the organisation's mandate.
- [17] MOPAN 4 assessments provide a multidimensional snapshot of organisational performance using the recently updated MOPAN 3.1 methodology, and assess the selected organisation's strategic, operational, relationship and performance management, as well as its results. MOPAN assessments provide a holistic picture of an organisation's performance. Due to the diversity of organisations' mandates and structures, MOPAN does not compare or rank organisations; accordingly, it is suitable to serve as the basis for the evaluation of the Integrity Authority. The choice of the MOPAN framework was examined by the Eligibility Committee at the recommendation of the OECD, and selected it as the basis of its evaluation system.
- [18] MOPAN's performance areas are widely applicable for assessing the organisation's activities. In line with the logic of the framework, results are assessed on the basis of the organisation's own activities and tasks. This approach allows for the adjustments necessary to take into account the specific characteristics of the organisation concerned; accordingly, we prepared a separate questionnaire for the Integrity Authority and, integrating the responses to data requests and the information received into the framework, we present the outcome of the review.
- [19] The MOPAN approach is specifically attentive to the changing environment, the effectiveness of organisational and development activity, and the assurance of continuity, bearing in mind that the principle of "function" should prevail over "form", and that the existence of a system is not sufficient to demonstrate "effectiveness".
- [20] MOPAN is based on a systems-thinking approach, focusing on complexity and interrelations rather than linear cause-and-effect relationships. The framework can be applied to analyse different dimensions of organisational effectiveness, including leadership style, the management of organisational change, team dynamics and sustainability. Accordingly, in the case of the Integrity Authority, in addition to the lawful implementation of statutory tasks, attention must also be paid to issues such as ensuring the operation of the board, the stability of the organisation's leadership, staff turnover, and ensuring sustainable and efficient operations.
- [21] MOPAN's approach is to examine organisational performance through the analysis of five dimensions of the external and internal environment. Through the analysis of internal and external coordination, we examine the organisation's ability to cooperate in order to achieve its objectives. In the course of the evaluation, we examine whether the resources available ensure the operation of the organisation and whether the organisation manages these resources efficiently, in other words, how the capacity to

¹ <https://www.mopanonline.org/>

mobilise available resources affects the performance of organisational functions such as external relations, human resources management, financial management, internal control, procurement, risk management and evaluation.

- [22] The framing questions and the organising principles of the report were also developed on the basis of the Integrity Authority's statutory tasks. On the basis of the MOPAN framework's recommendation, we seek answers in particular to the following questions:
- To what extent does the enabling environment support the operation of the Integrity Authority?
 - To what extent does the organisation identify current, as well as anticipated and future, challenges?
 - To what extent are the organisation's initiatives and activities directed towards fulfilling its tasks and cooperating with others?
 - Does the organisation operate successfully, and are its processes, resources and tools directed towards the fulfilment of its mandate?
 - To what extent does the organisation effectively fulfil its statutory tasks?
- [23] Previous MOPAN assessments did not systematically take into account the operating and financing environment, governance, leadership and organisational culture. Therefore, in our case, by following the MOPAN 4 framework, we will assign similar emphasis to these areas in the preparation of the report. Similarly, we pay attention to the issues of internal governance measures, internal management practices and internal organisational culture highlighted in the framework, which greatly influence the organisation's efficiency, effectiveness and the sustainability of its activities.
- [24] The report contains findings in relation to both the Integrity Authority and the Board, which it treats consistently in its recommendations. In terms of its purpose, the report aims to provide a general overview of the operation of the Integrity Authority and its Board, and formulates recommendations for effective and efficient future operation, which is in line with the tasks of the Eligibility Committee as defined in the Integrity Authority Act.
- [25] In addition to the MOPAN framework, the Eligibility Committee also applied the requirements of the ISO 37001 (anti-bribery management systems) standard, as it deals with addressing phenomena related to the operation of certain organisations, for the uncovering of which the Integrity Authority was established. The standard defines the organisation's role in preventing, detecting and addressing corruption, and in complying with anti-corruption legislation. The standard is applicable to all organisations (public, private, non-profit sectors), regardless of their type, size or the nature of their activities. The standard focuses on anti-corruption activities during the implementation of which the given organisation can identify the external and internal risks related to its operation and the preventive measures that can be taken in response, managerial tasks, scopes of authority and responsibility, multi-level control mechanisms applicable to all processes and business partners, rules for employees, as well as procedures related to internal audit and the reporting and investigation of suspicious cases, and regular periodic checks.

- [26] In preparing the report, the Eligibility Committee reviewed, as a reference, the publicly available information on the activities of peer authorities operating in other European countries – namely the Lithuanian Specialiųjų Tyrimų Tarnyba (Special Investigation Service, STT), the Latvian Corruption Prevention and Combating Bureau (KNAB), the Italian Autorità Nazionale Anticorruzione (Anticorruption Authority, ANAC) and the United Kingdom Serious Fraud Office (SFO).

III. General Findings on the Functioning of the Authority and of the Board Based on the MOPAN framework

- [27] Sections 32–34 of the Integrity Authority Act set out the basic provisions applicable to the President and Vice-Presidents of the Authority. Under these provisions, the members of the Board are the President and the Vice-Presidents of the Authority; however, pursuant to the Act, the President is only the President of the Authority and not the Chair of the Board. During the entirety of the reviewed period, the Board operated without a formally elected chairperson. At each of its meetings, the Board elected an acting Chair, in every instance being Ferenc Bíró. During the period under review, the Board met regularly.
- [28] In the reviewed period, the conditions for the Authority’s operation were established, both in terms of material resources and staffing. The President of the Authority and the Board established the conditions for operation, and the Authority began performing its tasks prescribed in the Integrity Authority Act. The Board adopted a decision to launch an investigation for the first time on 15 February 2023, and on 28 June 2023 it adopted the Authority’s first investigation reports.
- [29] According to Section 34(3) of the Integrity Authority Act, the Authority’s Board reports annually to the National Assembly on its activities. The report must also be sent to the European Commission. The Eligibility Committee found that in respect of 2023, the Board fulfilled this reporting obligation in 2024, and the report was also sent to the European Commission. In 2025, the Board likewise fulfilled its reporting obligation in respect of 2024.

IV.1. Findings Relating to the Functioning of the Board

IV. 1.1. Legal provisions Concerning the Mandate and Functioning of the Board

- [30] Section 34 of the Integrity Authority Act sets out the basic provisions applicable to the Board. Section 34(1) provides that the Board is the Authority’s supreme decision-making body, whose members are the President of the Authority and its two Vice-Presidents. Under Subsection (2), the Authority’s Board takes decisions directly related to the exercise of the Authority’s tasks and powers as a body, by majority voting. Subsection (3) imposes a reporting obligation towards the National Assembly.
- [31] Three provisions of the Integrity Authority Act lay down rules on the specific relationship between the President of the Authority and the Board. While Section 34(1) states that the Board is the Authority’s supreme decision-making body, pursuant to

Section 32(1) the President heading the Authority performs their work relating to the management of the Authority in cooperation with the two Vice-Presidents of the Board, and under Section 32(2) the President exercises their tasks and powers in accordance with the Board's decision.

- [32] Beyond the preceding two Subsections, the Integrity Authority Act does not provide detailed guidance as to which decisions fall within the competence of the Board.
- [33] In view of the statutory provisions detailed above, it can be established that the President's tasks and powers – which are otherwise set out in the Section 33 of the Integrity Authority Act – extend to the leadership and management of the Authority; however, they are not the head but a member of the Board, with the same rights and obligations as the Vice-Presidents and, therefore, according to the interpretation of the Eligibility Committee, they have no independent powers regarding the Board's operation or the detailed definition of its operational framework.

IV.1.2. Rules of Procedure of the Board

- [34] The Board may determine in its own rules of procedure, adopted by itself, the provisions which, on the one hand, serve the exercise of its powers in accordance with the relevant legal provisions and, on the other hand, serve to ensure that the Board can carry out its work with the greatest possible efficiency. Although no legal regulation makes it mandatory for the Board to adopt rules of procedure, such adoption nevertheless seems advisable in order to appropriately ensure its operational framework.
- [35] At the Board's meetings, an agenda proposal concerning the Rules of Procedure was tabled a total of four times – on 16 December 2022, 31 January 2023, 15 February 2023 and 15 January 2024 – of which, on the first occasion, the Board did not discuss the proposal. On each occasion, the President of the Authority submitted the proposal; the Vice-Presidents did not submit any independent proposal concerning the Rules of Procedure. A vote on the proposal concerning the Rules of Procedure was held three times within the Board – on 31 January 2023, 15 February 2023, and 15 January 2024 – but it was not adopted on any of those occasions. The Eligibility Committee was unable to identify the reasons for the failure during the review.
- [36] As a consequence of these unsuccessful votes, the Board operated without formally adopted Rules of Procedure throughout the entire period under review.
- [37] At their meeting on 15 January 2024, although the members of the Board did not adopt the submission concerning the rules of procedure, they agreed that in exceptional cases meetings may also be held online and that written voting is possible.
- [38] Prior to this, a written vote took place on one occasion, on 4 July 2023. During the review, the Eligibility Committee did not succeed in identifying the procedural legal basis for this written vote held outside a meeting.

- [39] Following the Board's agreement of 15 January 2024 on the holding of written votes, the Board held written votes on a total of 9 occasions by the end of November 2024. (In addition, the Board held a total of 8 meetings in the first 11 months of 2024). The Eligibility Committee did not receive an answer to its question as to what the exceptional reason was for these written votes, with particular regard to the fact that such written votes held outside a meeting were also used for the adoption of the annual report for 2023 and the annual analytical integrity report.

IV. 1.3. The Integrity Authority's Organisational and Operational Regulations and the Board's allocation of powers

- [40] The Bylaws of the Authority – as an internal regulatory instrument – take the form of a presidential directive, which comprehensively regulates the entire Authority's internal organisational structure and the activities and responsibilities of the individual organisational units.
- [41] The Bylaws and its amendments were in all cases, with one exception, approved by the President of the Authority. The Board discussed and adopted the Bylaws only once, at its very first meeting on 18 November 2022, but thereafter all amendments were made without a board decision, by presidential approval only.
- [42] Over the two-year period under review, there were a total of 8 instances of amending the Bylaws or issuing new Bylaws.
- [43] The annex to the Bylaws, among the tasks of the Authority's organisational units, contains detailed provisions on the allocation of powers, including ones concerning the Board. The Bylaws' amendments significantly affected and, as a pattern, curtailed the Board's scope of powers. These amendments restricting powers were not justified by legislative changes and were neither discussed nor approved by the Board on any occasion.
- [44] With regard to this regulatory arrangement, the Eligibility Committee points out that, in the absence of an explicit statutory provision, the President of the Authority is not entitled – even to make up for such absence – to determine provisions relating to the Board's powers in a presidential order issued unilaterally, whether with or without the Board's agreement. This is a legislative task which should be set out not in an internal regulation but in the Integrity Authority Act. The absence of statutory regulation cannot be remedied in an internal regulation (in a presidential order).
- [45] The table containing the changes to the Board's powers as defined in the Bylaws is included in the annex to the Report.

IV.1.4. Deed of Foundation of the Integrity Authority and Regulation of the Competence of the Board

- [46] The Deed of Foundation and its amendment contain no provision or reference indicating that a Board operates at the Authority and, therefore, include no provisions

on its activities, tasks or powers.

IV.1.5. Assessment of the Operational Functioning of the Board

- [47] During the period reviewed, the Board met regularly: three times in 2022, fifteen times in 2023, and eight times in the first 11 months of 2024. In addition to meetings, the Board held one written vote in 2023 and nine in 2024.
- [48] During the period reviewed, the Board adopted a total of 25 investigation reports, selected the members of the Anti-Corruption Working Group, took action where necessary to replace members, and approved the Authority's annual report on operations and the annual analytical integrity report.
- [49] Until June 2024, the Board adopted a resolution in every case on the commencement of investigations. From June 2024 onwards, proposals on the commencement of investigations no longer appear among the Board's agenda items, and thus the Board does not take decisions on these. The Eligibility Committee did not receive answers to its questions as to
- why, from June 2024 onwards, the Board does not discuss and take a decision on the commencement of investigations?
 - on what grounds the decision was taken that the Board would not discuss and would not decide on the commencement of investigations?
 - on what legal basis the Bylaws issued by the President of the Authority unilaterally alter the powers continuously exercised by the Board up to June 2024?
- [50] Despite the fact that, under the Integrity Authority Act, the Board is the Integrity Authority's supreme decision-making body, during the two-year period reviewed, the Board did not discuss the Authority's draft budget and the report on the implementation of the budget on a single occasion.
- [51] Despite the fact that, under the Integrity Authority Act, the Board is the Integrity Authority's supreme decision-making body, during the two-year period reviewed, neither the Authority's public procurement plan nor the approval of any – or at least specified higher-value – public procurements was placed on the Board's agenda even once.
- [52] Having reviewed the relevant regulation, the Eligibility Committee found that, under Section 33(1)(d) of the Integrity Authority Act, the President of the Authority performs, in respect of the Authority's budget, all tasks which the Act on Public Finances assigns to the head of the body directing the chapter. Under Section 33(2) of the Integrity Authority Act, the President of the Authority exercises this power independently. According to Section 34 of the Integrity Authority Act, the Board is the Authority's supreme decision-making body, and Section 32(1) imposes a requirement on the President to perform their work in cooperation with the two Vice-Presidents, while Section 32(2) provides that the President exercises the Authority's tasks and powers in

accordance with the decision of the Authority's Board.

- [53] The Eligibility Committee found that the provisions of the Integrity Authority Act do not provide clear guidance as to which powers relating to budget planning, budget reporting, and the planning and conduct of public procurement are exercised by the President independently, in which cases the exercise of their power requires a decision by the Board, and in which cases the Board is to be regarded as the holder of the power.
- [54] The Board first adopted the Authority's annual report on 28 February 2024 by way of a written vote; however, the Annual Report required amendment following its adoption, on which the Board voted in writing on 11 March 2024 without holding a meeting. On this basis, it can be established that the Board adopted the report on the activities for 2023 without having substantively discussed it.

IV.1.6. Exercise of employer's rights

- [55] The employment of the Authority's staff is predominantly based on Act CVII of 2019 on Bodies of Special Legal Status and on the Legal Status of their Employees (hereinafter: Act on Bodies of Special Legal Status), and in certain cases on the Labour Code. In both cases, employer's rights are exercised by the President.
- [56] In the case of the President and Vice-Presidents of the Authority, the establishment and termination of employment relationships is based on the Integrity Authority Act.
- [57] Exercising employer's rights in respect of the President, other than the establishment and termination of the legal relationship, raises specific issues; in respect of which, Section 45(2)
- provides that "employer's measures related to the President of the Authority's public service relationship that are not specified in this Act shall be taken by the Vice-President designated in the Authority's Organisational and Operational Regulations."
- [58] According to the information obtained during the review, the designation under Section 45(2) of the Integrity Authority Act appears in the following provisions of the Bylaws:
- Order No. 1/2022. (XI.18.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 12(2);
 - Order No. 1/2023. (I.23.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 11(2);
 - Order No. 13/2023. (IV.4.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 11(2);
 - Order No. 17/2023. (VI.8.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 11(2);
 - Order No. 29/2023. (X.5.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 11(2);
 - Order No. 2/2024. (I.31.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 11(2);

- Order No. 18/2024. (VI.18.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 11(2);
- Order No. 23/2024. (X.4.) of the President of the Integrity Authority on the Organisational and Operational Regulations, Section 19(2);

[59] Having reviewed all versions of the Bylaws, the Eligibility Committee established that from the outset until the repeal of the Organisational and Operational Regulations issued by Presidential Order No. 18/2024 (VI. 18.), there was a clear provision stating that the employer's rights over the President pursuant to Section 45(2) of the Integrity Authority Act were exercised by Vice-President Tímea Holbusz. With the entry into force of Presidential Order No. 23/2024. (X.4.), however, the exercise of employer's rights over the President is no longer clear, since Section 19(2) of this Presidential Order no longer designates any Vice-President as the person exercising employer's rights, but instead provides that "with regard to the President's public service relationship, the employer's measures not specified in the Integrity Authority Act shall be taken by the Vice-President designated for this purpose". Since it is not clearly specified which of the two Vice-Presidents is designated for this purpose, or whether either is designated at all, it cannot be established which of them may lawfully exercise these rights since 4 October 2024. This deficiency not only results in legal uncertainty but may also create a directly unlawful situation, since the exercise of employer's rights is not merely a right but, in many cases, also the performance of employer's obligations (e.g. granting statutory leave), and determining any disciplinary liability likewise falls within this scope.

IV.2. Findings Concerning the Internal Audit Function of the Authority

- [60] During the period under review, the Authority established its internal audit organisation.
- [61] However, the Eligibility Committee did not assess the internal audit activity in detail, since it is not the task of the Eligibility Committee to perform internal audit activities or to conduct a detailed review of individual findings of the internal auditor.
- [62] The Authority's internal auditor position is filled; the current internal auditor has held this position since November 2023 and performs the related tasks.
- [63] During the period under review, the Board did not place the internal audit plan on its agenda; this occurred for the first time in January 2025.
- [64] In 2024, the internal auditor – albeit without an internal audit plan discussed by the Board – conducted a total of three major audits.
- [65] Having reviewed the relevant regulation, the Eligibility Committee found that, under Section 33(1)(d) of the Integrity Authority Act, the President of the Authority performs, in respect of the Authority's budget, all tasks which the Act on Public Finances assigns to the head of the body directing the chapter. Under Section 33(2) of the Integrity Authority Act, the President of the Authority exercises this power independently. According to Section 34 of the Integrity Authority Act, the Board is the Authority's

supreme decision-making body, and Section 32(1) imposes a requirement on the President to perform their work in cooperation with the two Vice-Presidents, while Section 32(2) provides that the President exercises the Authority's tasks and powers in accordance with the decision of the Authority's Board.

- [66] With regard to the regulatory environment described in the preceding Subsection, the Eligibility Committee found that it does not create a clear situation as to which powers in relation to internal audit are exercised by the President independently, in which cases the exercise of their power requires a decision by the Board, and in which cases the Board is to be regarded as the holder of the power.

IV. 3. Findings Concerning the Functioning of the Authority

- [67] A total of 367 reports were received by the Authority during the period under review (143 of these via the anonymous reporting line). Their number increased in the first year of the period under review, then dropped sharply by the end of the period.
- [68] During the two years of the period reviewed (up to November 2024), the Authority completed a total of 25 investigations, each case being closed with a report approved by the Board. In these cases, the total amount of funds exceeded HUF 57 billion. According to the Authority's 2024 report, the number of closed investigations was 5 in 2023 and 21 in 2024. In 2023, 21 investigations were opened, and 25 in 2024.
- [69] At the end of the second year of the Authority's operation, a total of 23 investigations were ongoing, in which the total amount of funds was close to HUF 114 billion.
- [70] Although in the first two years the Authority's effective operation was still influenced by tasks related to organisational development and the establishment of the operational framework, the Eligibility Committee points out that, with more efficient operational functioning, a far more intensive professional activity could have been achieved compared to performance in the first two years, when compared with the statistics of peer authorities. Although the legal framework governing competence is not entirely identical, the Latvian peer authority, KNAB, conducted 273 investigations in 2023, initiated 36 criminal proceedings and 18 prosecutorial proceedings. In its investigations, the Lithuanian peer authority, STT, identified 277 criminal offences and opened 84 investigations. Based on the data available on the website of the Integrity Authority, in the course of its investigation procedures it filed 1 criminal report in 2023 and 4 in 2024.
- [70/A] The Eligibility Committee also points out that, according to the European Union's medium-term financial plan for 2021–27, in Hungary – without taking into account that funds in an amount determined under the conditionality procedure have been suspended – a total of EUR 34.5 billion of EU budgetary support may be used over seven years (excluding ReactEU and RRF funds), which means the use of grants averaging EUR 4.92 billion / HUF 1,968 billion per year. Since, according to the Authority's annual report, the investigations closed in 2024 concerned HUF 57.4 billion in grants, it can be concluded that the Authority's annual activity covers only 2.9% of the EU budgetary

support allocated to Hungary on an annual basis. The Authority's annual operating expenditures amounted to HUF 4.1 billion in 2024, which also means that the Authority's operating cost, relative to the amount of grants under investigation, corresponds to 7%².

IV. 3.1 Findings Concerning the Authority's Administrative Functioning

- [71] The Authority operates a reporting interface and system that ensures anonymity (Whispli). Whispli is a system operated abroad, in France (Whispli, société par actions simplifiée à associé unique, registered office: 10 rue de la Paix, 75002 Paris, France, number registered in the Paris Trade and Companies Register: 853 011 278 00019). The Authority uses Whispli as a data processor. According to the privacy notice, the Authority does not transfer data to any third countries.

The Eligibility Committee points out that, from a data processing and information security perspective, it sees a serious risk in the foreign processing of data related to the reporting of misconduct and abuse.

- [72] During the period under review, the Authority opened investigations on the basis of reports and ex officio. No application or complaint serving as the basis for an investigation was received by the Authority.
- [73] Until June 2024, decisions to open investigations were taken by the Board in each individual case. Following the June 2024 amendment to the Bylaws, which was not approved by the Board, submissions relating to the initiation of investigations are not placed on the Board's agenda; the decision to open investigations is taken by the Authority's Director of Professional Affairs. During the review, the Eligibility Committee was unable to determine the professional or legal justification for this change.

The Eligibility Committee points out that it sees a significant risk to the lawfulness of the Authority's operation in the situation that has arisen, since, if the lawfulness of initiating an investigation cannot be adequately substantiated, the lawfulness of the investigation's findings and of the measures proposed is also called into doubt.

- [74] The Authority concludes each investigation it initiates with a report. From the outset, the reports concluding the investigations have, without change, been submitted to the Board and have been adopted by the Board.
- [75] Acting within the scope of its tasks defined in Section 5(1)(b) of the Integrity Authority Act, it prepared its annual analytical integrity report in both 2023 and 2024.
- [76] During the period under review, in 2023 and 2024, the Authority conducted a total of 7 administrative audits related to public procurement pursuant to Section 5(3)(a) of the Integrity Authority Act.
- [77] During the period under review, in 2023 and 2024, the Authority did not on any occasion impose an obligation to provide information in relation to public

² Source: https://hungary.representation.ec.europa.eu/strategia-es-prioritasok/az-eu-koltsegvetese-magyarorszagon_hu, 2024 Annual Report of the Integrity Authority

procurements implemented from European Union funds pursuant to Section 5(3)(b) of the Integrity Authority Act.

- [78] Pursuant to the Integrity Authority Act (Section 5(3)(c) and Section 28), the Authority's task is to establish a register of legal persons, individual firms and sole traders excluded from public procurement procedures in connection with certain criminal offences. During the period under review, the Authority did not establish this register.

According to the information provided by the Authority, it did not commence operating the register of persons excluded from public procurement procedures in the absence of the conditions specified in the Integrity Authority Act, since the conditions for a direct data link with the criminal records system, the company information system and the beneficial ownership register are not ensured from a regulatory perspective.

- [79] Under Section 5(4) of the Integrity Authority Act, the Authority verifies, as laid down in legislation, the declarations of conflict of interest made by staff members of DGAEF and of the Directorate of Internal Audit and Integrity (DIAI). The Authority actually commenced the verification of these declarations after the period under review, on 7 December 2024 (DIAI) and on 7 January 2025 (DGAEF).

- [80] Section 5(6) of the Integrity Authority Act confers competence on the Authority to verify the asset declarations of the heads and members of certain state institutions, to conduct or initiate asset declaration procedures, while Section 5 (7) of the Integrity Authority Act provides for the initiation of an audit procedure in connection with asset declarations. In relation to the exercise of this power, the Eligibility Committee did not receive substantive answers to its questions as to:

- How did the Authority fulfil its task of verifying the asset declarations of the persons specified in Section 5(6)?
- How does the Authority determine the extent that is necessary, in connection with verifying the asset declarations of the persons specified in Section 5(6), for the performance of its tasks?
- Has the Authority conducted an asset declaration procedure against anyone?
- Has the Authority, pursuant to Section 5(6), initiated any procedure related to asset declarations against anyone?
- Has the Authority, pursuant to Section 5(7), initiated any audit procedure related to asset declarations against anyone?

- [81] Section 7(1) of the Integrity Authority Act provides that the conflict of interest rules set out in Act CVII of 2019 on Bodies of Special Legal Status and on the Legal Status of their Employees (Act on Bodies of Special Legal Status) shall apply to the Authority's civil servants, in particular the rules laid down in Section 24 of the Act on Bodies of Special Legal Status concerning a no criminal record – with particular regard to the grounds for exclusion related to corruption offences – and the rules on the prohibition of joint employment and conflicts of interest under Section 51 of the Act on Bodies of Special Legal Status. According to the information provided by the Authority, the conflict of interest rules applicable to the Authority's civil servants are laid down in the Authority's Public Service Regulations and Code of Ethics, and the civil servants make conflict of interest declarations in accordance with these regulations.

- [82] Section 7(2) of the Integrity Authority Act provides that the Authority shall take appropriate measures to prevent, detect and remedy situations that may be considered an objective conflict of interest in respect of persons involved in the exercise of its powers and in the performance of its tasks. The Eligibility Committee did not receive a substantive answer to its question as to what measures the Authority has taken to prevent, detect and remedy situations that may be considered an objective conflict of interest in respect of persons involved in the exercise of its powers and in the performance of its tasks. In its reply, the Authority merely referred to its Public Service Regulations and Code of Ethics.
- [83] Section 9 of the Integrity Authority Act sets out tasks for the Authority relating to integrity risk assessment, including assessing the integrity situation of the public procurement system in Hungary. The Act stipulates that the integrity risk assessment be carried out in cooperation and consultation with international organisations that have an internationally recognised integrity assessment methodology – in particular the OECD – and further requires that feedback from national and international civil society organisations monitoring integrity in Hungary be taken into account. In its reply to the question concerning the implementation of this task, the Authority merely referred to the fact that it has an integrity risk assessment practice; the Eligibility Committee did not receive a substantive answer to its questions as to, in relation to this task:
- Specifically, in cooperation with which international organisations did the Authority prepare its integrity risk assessment in 2023 and 2024?
 - Feedback from which national and international civil society organisations monitoring integrity in Hungary did the Authority consider during the integrity risk assessment in 2023 and 2024?
- [84] Sections 10 and 12 of the Integrity Authority Act provide that the Authority shall prepare an annual analytical integrity report. The Authority fulfilled this task in both years of the period under review, publishing them on its website together with the Government's responses.
- [85] Pursuant to Section 14(2) of the Integrity Authority Act, the Authority may issue ad hoc recommendations in the course of its investigations. After reviewing the Authority's investigation reports, the Eligibility Committee found that the Authority exercises this power on a regular basis.
- [86] Pursuant to Section 15(1) of the Integrity Authority Act, the Authority, in connection with a public procurement procedure implemented or planned to be implemented in whole or in part from European Union funds, may issue recommendations regarding the type of procedure, the method, the application of exclusion grounds, and the application of unlawful conduct. In relation to the application of these recommendations, the Eligibility Committee did not receive a substantive answer to its questions as to
- In how many cases has a recommendation under Section 15(1) been issued so far? – To what extent did the recipients take into account the recommendations issued by the

Authority under Section 15(1)?

In its response, the Authority merely indicated that the Authority's recommendations are included in the investigation reports adopted by the Authority's Board. Upon reviewing these investigation reports, the Eligibility Committee found that during the period under review, the Authority did not on a single occasion make a recommendation that the person or organisation under review should

- a) apply a specific type of public procurement procedure,
- b) apply a certain specific procurement method,
- c) refrain from applying one or more types of public procurement procedures or from applying any of the related practices,
- d) refrain from applying one or more specific procurement methods or any related practices; or
- e) in the contract notice launching the public procurement procedure, stipulate the application of one or more grounds for exclusion set out in Section 63(1) of Act CXLIII of 2015 on Public Procurement (for the purposes of this Section hereinafter: Public Procurement Act),
- f) cease any other unlawful conduct.

[87] Under Section 15(4) of the Integrity Authority Act, in the event of an infringement by the contracting authority related to the Authority's recommendation, the Authority may initiate proceedings by the body or court having competence and powers; in particular, in the event of a public procurement infringement, it may initiate the proceedings of the Public Procurement Arbitration Board pursuant to Section 152(1)(o) of the Public Procurement Act. According to the information provided by the Authority, the Authority did not initiate court, Public Procurement Arbitration Board or other administrative proceedings during the period under review on the basis of Section 15(4).

[88] Pursuant to Section 16(1) of the Integrity Authority Act, the Authority may examine, during the evaluation of tenders or requests to participate in a public procurement procedure implemented or planned to be implemented from European Union funds, the applicability of the grounds for exclusion to a specific economic operator as set out in Section 62(1) and (2) of the Public Procurement Act, or – if stipulated by the contracting authority in the procedure – those set out in Section 63(1) of the Public Procurement Act. According to the information provided by the Authority, the Authority did not conduct investigations under Section 16(1).

[89] Pursuant to Section 18(1) of the Integrity Authority Act, for the purpose of performing its tasks, the Authority may, in connection with its scope of tasks and powers, request the provision of data from any person or organisation involved in the case concerned. According to the information provided by the Authority, during the period under review there was only one instance where the organisation contacted refused the Authority's request to provide data.

- [90] Under Section 18(2) of the Integrity Authority Act, the Authority may request the organisation with tasks and powers in the field of monitoring the use of European Union funds to carry out evidentiary actions on its behalf; the requested organisation shall proceed in accordance with the rules applicable to its supervision. According to the information provided by the Authority, during the period under review such cooperation took place with the governing authorities, on four occasions in total. The Authority considered these cooperations to be successful.
- [91] Sections 18(4), (5) and (11) of the Integrity Authority Act set out the conditions for handling classified data. The Authority has prepared and published the relevant regulations and policies.
- [92] Under Section 19(2) of the Integrity Authority Act, prior to issuing the report, the Authority may, allowing an appropriate deadline, provide the person or organisation concerned by the report with an opportunity to comment on the draft report. During the period under review, out of 25 investigations closed with a report, the draft report was sent to the organisation under review on a single occasion. The Eligibility Committee found that during the period under review, the Authority did not have an established methodological regulation regarding the advance dispatch of draft reports, even though in many cases this would also contribute to improving the quality of the Authority's professional work. The Eligibility Committee was unable to ascertain which professional standard of the Authority determined whether it would send its draft report to the body under review before finalisation, and how and to what extent it responds to the observations of the body under review when drawing up its final report.
- [93] Pursuant to Section 21(1) of the Integrity Authority Act, if, in the course of an administrative audit, the Authority detects a suspicion of fraud, corruption, conflict of interest or other serious infringement or irregularity affecting the achievement of sound and efficient financial management within the framework of EU budgetary funds or the financial interests of the European Union, or where such a risk arises, it may order, in a procedural decision, the suspension of the public procurement procedure involving European Union funds for a period not exceeding two months.

According to the information provided by the Authority, during the period under review, in the course of administrative audits conducted by the Authority, the public procurement procedure was suspended on a single occasion, against which, however, the contracting authority concerned opened administrative proceedings. The court annulled the suspension.

- [94] Pursuant to Section 22(1) of the Integrity Authority Act, the Authority may, by decision, require specified contracting authorities to inform the Authority, in specified cases, of the initiation of a public procurement procedure implemented with the involvement of European Union funds.

According to the information provided by the Authority, during the period under review, the Authority did not take any measures under Section 22(1) of the Integrity Authority Act.

- [95] Under Section 22(3) of the Integrity Authority Act, the Authority is required to determine in advance and publish the risk indicators, the judicial, Public Procurement Arbitration Board or other administrative authority case-law, or the audit experience of the European Commission or domestic auditing bodies, on the basis of which it requests information under this Section.

According to the information provided by the Authority, during the period under review the Authority did not publish the indicators, case-law or audit experience specified under Section 22(3) of the Integrity Authority Act.

- [96] Under Section 23 of the Integrity Authority Act, the Authority shall impose an administrative fine on the contracting authority in the event of failure to comply with the obligation under Section 21(1) and Section 22(1).

According to the information provided by the Authority, during the period under review the Authority did not impose any administrative fines under Section 23.

- [97] Pursuant to Section 24(1) of the Integrity Authority Act, the Authority is obliged to report to the authority or body with the relevant tasks and powers, including the European Anti-Fraud Office (OLAF), and – by simultaneously sending the report to the prosecution service – also to the European Public Prosecutor’s Office, if it detects a suspicion of fraud, conflict of interest, corruption or any other infringement or irregularity. Officials of the Authority are subject to the reporting obligation under Section 376(2) of Act XC of 2017 on Criminal Proceedings.

According to the information provided by the Authority, during the period under review the Authority filed a criminal report in 8 cases on suspicion of a criminal offence. According to the information provided by the Authority, concurrently with its submission, the Authority also notified the Office of the Prosecutor General, OLAF and the European Public Prosecutor’s Office of the filing of the report.

- [98] Pursuant to Section 24(2) of the Integrity Authority Act, if the Authority considers that, on the basis of the evidence in its possession, it is justified to initiate competition supervision proceedings, it shall immediately forward the evidence at its disposal to the Hungarian Competition Authority.

According to the information provided by the Authority, during the period under review the Authority initiated competition supervision proceedings in three cases.

- [99] Under Section 24(3) of the Integrity Authority Act, if, in the course of its examination, the Authority uncovers a suspicion of irregularity, it is entitled, on the basis of the provisions of the legislation governing the use of European Union funds, to initiate an irregularity procedure with the governing authority with the relevant tasks and powers or – in the case of a project financed from the Recovery and Resilience Facility – with the national authority.

According to the information provided by the Authority, during the period under review the Authority initiated irregularity procedures with the governing authorities in 13 cases.

- [100] Pursuant to Section 24(4) of the Integrity Authority Act, under Section 152(1)(o) of the

Public Procurement Act, the Authority may initiate proceedings before the Public Procurement Arbitration Board if it becomes aware of conduct or an omission that conflicts with the Public Procurement Act or with a regulation adopted under the authorisation granted by the Public Procurement Act.

According to the information provided by the Authority, during the period under review the Authority initiated proceedings before the Public Procurement Arbitration Board in three cases.

- [101] Under Section 25(1) of the Integrity Authority Act, for the purpose of performing its supervisory or control tasks, the Authority may call upon the organisation with the relevant tasks and powers regarding the control of the use of European Union funds to initiate proceedings.

According to the information provided by the Authority, during the period under review, the Authority initiated the commencement of proceedings by the organisation with relevant tasks and powers in the field of control of the use of European Union funds on one occasion.

- [102] Under Section 26 of the Integrity Authority Act, the Authority may call upon the competent supervisory authority to conduct the procedure under Section 15(2) of the General Administrative Procedure Act, and may bring an action for failure to act before a court under the provisions of Act I of 2017 on General Public Administration Procedures if the authority with the relevant tasks and powers has not fulfilled its procedural obligation under Section 18(2) or Section 25(1).

According to the information provided by the Authority, during the period under review no notice under Section 26 was issued by the Authority. According to the information provided by the Authority to the Eligibility Committee, during the period under review the Authority brought an action for failure to act on one occasion.

- [103] Under Section 27 of the Integrity Authority Act, in administrative court proceedings, the Authority may challenge any decision of the Public Procurement Arbitration Board and any other administrative decision relating to a public procurement procedure that concerns European Union funding.

According to the information provided by the Authority, during the period under review the Authority did not challenge a decision of the Public Procurement Arbitration Board or another authority under Section 27(1).

- [104] Under Section 27/A of the Integrity Authority Act, in the case of a special criminal offence relating to the exercise of public authority or the management of public assets, the Authority may submit a motion for revision and a motion for repeated revision under the Act on Criminal Procedure.

According to the information provided by the Authority, in 2023, the Authority submitted a motion for revision in 6 cases and in 2024 in 12 cases, of which the use of European Union funds was also involved in 8 cases. In one case, a repeated motion for revision was submitted. In 2023, in one case the competent prosecutor's office upheld the Authority's motion for revision. In an additional 4 cases, the decision affected by

the motion for revision was brought before the Central District Court of Buda, which has jurisdiction to adjudicate, in one of which the court rejected the Authority's motion for revision and in the other three upheld the motion. In 2024, none of the motions for revision submitted by the Authority was rejected by the authority competent to adjudicate. In five cases, the competent prosecutor's office, and in three cases the Central District Court of Buda upheld the Authority's motion for revision.

With regard to the submission of motions for revision and repeated motions for revision, the Eligibility Committee wishes to highlight the following. Pursuant to Section 32(1) of the Integrity Authority Act, the Authority is headed by the President, who performs their duties in cooperation with the two Vice-Presidents within the Authority's Board. Under Section 32(2), the President does not exercise, on their own, the tasks and powers of the Authority that Section 33 does not assign to the President's exclusive competence, but in this respect is bound by the decisions of the Authority's Board. The submission of motions for revision and repeated motions for revision does not fall within the powers of the Authority that the President exercises independently; consequently, the decision on the submission of motions for revision and repeated motions for revision falls within the competence of the Board. Having reviewed the decisions of the Board, the Eligibility Committee did not find any board decisions relating to the submission of motions for revision and repeated motions for revision.

- [105] Having reviewed the Authority's procedural practice and the system of rules laid down in the Integrity Authority Act, the Eligibility Committee found that, in the case of the Investigation procedure (Integrity Authority Act, Chapter III, Subtitle 7), the statutory definition of procedural safeguards and their practical application are entirely lacking (e.g. the procedural rights of the person or organisation subject to the procedure, procedural time limits).
- [106] In addition to the above, under Chapter III of the Integrity Authority Act on the Authority's procedure, the Authority's investigation procedure does not qualify as an administrative authority procedure, as opposed to its administrative audits related to public procurements implemented with the involvement of European Union funds, which do qualify as an administrative authority procedure. Having examined the Authority's law-application practice, the Eligibility Committee found that, during the investigation procedure, the Authority's procedural rights are severely limited; in the event of refusal to cooperate by the organisation under investigation, the Integrity Authority Act does not provide for the application of coercive measures against it.
- [107] Section 75 of the Integrity Authority Act requires the Authority to prepare, by 31 December 2023, an ad hoc report reviewing the regulatory framework and operation of the Hungarian asset declaration system, including its scope and control process.

The Eligibility Committee found that the Authority fulfilled this task by the statutory deadline.

- [108] The provisions of Act XXV of 2023 on Complaints, Disclosures in the Public Interest, and Related Rules on Reporting Abuses of Public Interest (hereinafter: Whistleblower Protection Act) require state and municipal bodies – including the Integrity Authority – to operate a complaints handling system in cases falling under the scope of another

procedure, as well as a whistleblowing system for specified employers.

The Eligibility Committee found that the Authority fulfilled this task.

IV. 3.2. The Authority's professional relations

- [109] During the period under review, the Authority began to build its professional relations both internationally and domestically.
- [110] On the international stage, the Authority concluded a cooperation agreement with the European Anti-Fraud Office (OLAF) in the first two years of its operation.
- [111] Among domestic professional partners, the Authority concluded cooperation agreements with the National University of Public Service, the Internal Audit and Integrity Directorate of the Ministry of Public Administration and Regional Development, the National Tax and Customs Administration, the Hungarian State Treasury, the Hungarian Competition Authority, the Hungarian National Authority for Data Protection and Freedom of Information, the State Audit Office, the National Office for the Judiciary and the Directorate General for Public Procurement and Supply.
- [112] The cooperation agreements were approved by the Board before their conclusion.
- [113] The Authority initiated the conclusion of cooperation agreements with the Office of the Prosecutor General and the Public Procurement Authority as well, but these initiatives did not yield results. The Eligibility Committee was unable to determine the reasons for this during its review.

IV. 3.3 Performance management

- [114] In interviews with the heads of the Authority, the Eligibility Committee learned that during the period under review, the Authority faced significant staff turnover. The Eligibility Committee requested on several occasions that the President of the Authority provide information, broken down by month for the period under review, on the number of departing and incoming employees;

however, the President initially failed to provide said data, citing that the Authority does not keep the records requested by the Eligibility Committee. After repeated requests, the Eligibility Committee finally received the requested information in April 2025. According to the data received, during the 2-year period under review, a total of 158 employees joined the Authority and 40 left, which corresponds to a turnover rate of 25.3%.
- [115] No employment litigation was initiated between the Authority, as employer, and its employees during the period under review. At the time of the preparation of this report (June 2025), only one employment lawsuit was ongoing.
- [116] According to the Authority's statement, in June 2025, there were 2 "non-employment" lawsuits pending in connection with the Authority's tasks, seeking judicial review of decisions of the Public Procurement Arbitration Board. The number of previously

concluded lawsuits is 5, of which 1 was a default action under Section 127 of the Code of General Public Administration Procedures, brought against an organisation under investigation that refused to provide data in an investigation procedure, and 4 actions sought judicial review of decisions of the Public Procurement Arbitration Board.

[117] As regards the Authority's budget, under the Integrity Authority Act, the budget provides funds for the Authority's operation in line with the Authority's needs. With regard to the funds provided, according to the Authority's published budgetary report, a surplus of HUF 15.7 billion arose in 2023, which is linked to the headquarters investment that failed to materialise. Given that the 2024 budget (Act LV of 2023) envisaged HUF 13.1 billion in non-operating expenditures, the utilisation of which did not take place in 2024 either, this significant surplus also appears in 2024. According to the Authority's Report and Budgetary Report for 2024, the total budget for 2024 was HUF 19.8 billion, of which the operating budget was HUF 4.09 billion and the investment budget HUF 15.7 billion. The Authority did not use the investment budget amount of HUF 15.7 billion and repaid it to the Central Appropriation Surplus Settlement Fund.

[118] In the view of the Eligibility Committee, it would be appropriate for the Authority to set a good example not only in the use of budgetary funds, but also in sound budget planning, and to commit significant budgetary envelopes only if their use can be reasonably and appropriately implemented in the given budget year. The Eligibility Committee did not examine the issue of the necessity of building its own headquarters; during the interviews it received conflicting responses regarding the fact of the construction.

IV. 3.4. Findings concerning the Authority's operational functioning

[119] The Public Procurement Authority registered itself under the scope of the Public Procurement Act pursuant to Section 5(1)(c)(cb) of the same. During the period under review, based on data from the Electronic Public Procurement System, it initiated eleven public procurement procedures, two of which under the national regime. As a result of the calls initiating the procedures, it also established a Dynamic Procurement System for "office and end-user IT equipment". On the basis of the procurement objects, it can be established that the Authority does not use the services of centralised public procurement systems.

On the basis of the contract data made available, it cannot be excluded that, in applying the public procurement rules on the prohibition of splitting into lots pursuant to Section 19 of the Public Procurement Act, the Authority may in several cases have grouped its procurement objects and, particularly in relation to consultancy services, may have determined the value of procurement objects below the threshold so that the value of the contracts remained below the public procurement threshold, having regard to the scope of exemption under Section 111(g) of the Public Procurement Act as well as to the national threshold. (Annex 5) The Eligibility Committee recommends that the Authority seek to avoid even the appearance that it is not acting in accordance with the provisions of the Public Procurement Act when conducting its public procurements.

Among the contracts concluded, several were concluded for an indefinite term, which the Eligibility Committee recommends avoiding in the future.

- [120] Among the outsourced activities, the outsourcing of the information security officer carries a high risk, in connection with which the Eligibility Committee establishes the following:

Building a fully protected and reliable IT system is a strategic task for the Authority, for which it has allocated substantial resources and external experts (detailed data are available on the website of the Integrity Authority).

Furthermore, the Authority concluded two engagement agency contracts where the same legal person performed an information security task in one and acted as information security officer in the other, which raises conflict of interest concerns.

The Eligibility Committee recommends that the Authority have its own IT professionals and an information security officer with appropriate qualifications.

- [121] Serious conflict of interest concerns arise regarding the Brussels Office and the circumstances of its establishment and foundation. The Eligibility Committee does not assess the strategic decisions of the President of the Integrity Authority or the justification for establishing the Brussels office; however, the contracts concluded for the establishment of the Office and for financial advisory services for companies belonging to the same ownership group raise serious conflict of interest, security and financial concerns.

The Eligibility Committee recommends that measures and financial commitments in matters of such magnitude should be taken solely on the basis of a unanimous decision of the Board and, if a supportive decision is adopted, that a separate internal regulation be drawn up regarding the activities and operation of the Office; furthermore, that information on the operation and effectiveness of the Office be included in the Authority's annual report, and that the examination of the Office be mandatorily included each year in the Internal Auditor's annual work plan.

- [122] On the basis of the Integrity Authority's database³ containing the decisions of the Public Procurement Authority concerning negotiated procedures without prior publication of a contract notice, the Authority did not initiate such a procedure during the period under review. In their letter No. IH/I/72-1/2023, which was also published on the website of the Integrity Authority, the President of the Integrity Authority requested the Minister of Justice to authorise the selection of specialised service providers to ensure, as soon as possible, the basic IT needs required for the performance of the Integrity Authority's tasks and, in view of its autonomous legal status, its other organisational operating conditions. To this end, they requested statutory authorisation for the Integrity Authority, as a contracting authority, in relation to its public procurement procedures connected with its establishment and the commencement of its activities, to be entitled for at least one year, for its individual procurements, to apply and initiate a negotiated procedure without prior publication

³ <https://kozbeszerzes.hu/adatbazisok/hnt-dontes-oldal/>

of a contract notice on grounds of extreme urgency under Act CXLI of 2015 on Public Procurement. In view of the fact that the initiative conflicts with legislation, and that the relevant Directive 2014/24/EU contains no similar exception, the initiative thus proposes the conduct of procedures allowing the exclusion of an open procedure, which is unfounded in relation to the activities of the Integrity Authority or any other contracting authority and is based on a non-existent category of exception from a public procurement professional perspective.

- [123] The Authority has published its public procurement plan, which it amended four times in both 2023 and 2024. In the course of its supply activities, it typically launches its public procurement procedures under EU rules of procedure. In one case, a judicial remedy procedure was initiated before the Public Procurement Arbitration Board, concerning the public procurement procedure entitled “Procurement of communication services for 24 months – Part 1 EKR000314482024”, as well as the public procurement procedure entitled “Procurement of communication services for 24 months” – Part 3 EKR000314482024”⁴. According to the decision, on the basis of the ex officio extension of the judicial remedy procedure, the Arbitration Board found that the contracting authority had infringed Section 50(4) and Section 76(6)(b) of Act CXLI of 2015 on Public Procurement, annulled the calls for participation and the procurement documents for the procedures, and all decisions taken by the contracting authority in the public procurement procedures. The Integrity Authority has challenged the decisions, and those proceedings are currently ongoing. The procedure is not assessed by the Eligibility Committee; regarding the need for outsourcing, the Integrity Authority stated that the activity cannot be performed using internal resources.
- [124] On the basis of the staffing data published on the Authority’s website and statements made during the interviews, the Eligibility Committee established that the Authority provides market-level salaries for its employees: for 2023 and 2024, the average remuneration of the Authority’s staff, including salary, amounts to HUF 1.7–1.8 million per month. (Annex 6)
- [125] Based on the activity ratios of its employees presented in the Authority’s 2024 report prepared for the National Assembly, it can be seen (page 8⁵) that in 2024, of 113 employees, 52 perform support activities, 51 are the professional staff, while the presidency and presidential staff comprise 11 persons. In this case, those performing support activities (Operational Directorate, Security Office, Human Resources Office, International Relations Office, Integrity Academy and Communications Office, Internal Auditor) outnumber the staff of the Director of Professional Affairs. In the calculation, we expressly did not identify Presidential Staff as operational employees, and we also regarded the staff of the Registry Office indicated within the framework of the Director of Professional Affairs as employees performing professional activities. Considering the Authority’s personnel, the Eligibility Committee is of the view that the proportion of non-managerial employees actually performing professional activities and the employees directly supporting them is unjustifiably higher in the case of the non-

⁴ Proceedings opened under case numbers D. 511/2024, D. 515/2024.

⁵ <https://integritashatosag.hu/wp-content/uploads/2025/05/Integritas-Hatosag-orszaggyulesi-beszamolo-2024.pdf>

professional staff.

IV. 3. 5. Handling and internal regulation of integrity-breaching events

[126] The tasks and responsibilities of the Authority's President, Board and staff in relation to preventing the occurrence of events that breach organisational integrity (corruption) are duly set out in the internal regulations (Presidential Order on the procedure for handling events breaching organisational integrity).

[127] The Authority's anti-corruption risk analysis is based on multiple levels

- organisational operational processes / certain process descriptions and their control and review (integrated risk management procedure);
- risk analysis methodology.

The Board supervises the internal anti-corruption processes and measures related to the operation of the Authority, and the compliance adviser, acting within their own competence, may take action on complaints and public interest disclosures.

[128] During the period under review, prior to contracting with suppliers, partners and service providers, and thereafter at regular intervals during the course of the business relationship, the Authority carried out risk-based due diligence (compliance with the transparency conditions under the State Assets Act).

[129] Employees have familiarised themselves with and understood the Authority's anti-corruption policy (as defined by the Code of Ethics – in the form of an acknowledgement of having read it and a conflict of interest declaration, and also as part of regular training). In addition, upon recruitment, employees are required to submit an asset declaration and complete the questionnaire necessary for the national security clearance.

[130] The detailed rules for the segregation of authorisation to undertake commitments, countersigning, remittance and certification of performance are laid down in a separate Presidential Order.

[131] The regular review and audit of the financial control system is ensured by a separate, independent integrated financial-accounting (closed financial management information) system, which enables full and up-to-date recording of accounting processes and the provision of mandatory data services. (See: Accounting Policy, as well as the Chart of Accounts and Accounting System Policy). At the same time, there are regulations that were not yet drawn up during the period under review (e.g. Vehicle Use Policy)

[132] The Eligibility Committee found that the Authority made substantial efforts regarding the adequacy of its internal regulation; however, the embedding of second- and third-level controls into processes was only partially achieved during the period under review, particularly in matters of reputation and/or conflicts of interest.

V. Verification of the asset declarations and conflict of interest declarations of the President and Vice-Presidents of the Authority

- [133] Section 44(5) of the Integrity Authority Act assigns to the Eligibility Committee the task of verifying, prior to appointment, the truthfulness of the asset declaration of the person proposed as President and Vice-President of the Authority, as well as annually verifying the truthfulness of the annual asset declarations of the President and Vice-Presidents of the Authority, and preparing a report on the results of its verification.
- [134] Section 44(7) of the Integrity Authority Act also attaches legal consequences to the findings made in the course of verifying the asset declarations. If, during the verification, the Eligibility Committee finds that the person proposed as President or Vice-President of the Authority, or the President or a Vice-President of the Authority, has provided false information on material data or facts in the asset declaration, the Eligibility Committee is obliged to initiate with the President of the State Audit Office the termination of the legal relationship of the President or the Vice-President of the Authority.
- [135] The Eligibility Committee found that both before their appointment and thereafter annually, the President and the Vice-Presidents of the Authority fulfilled their obligation under the Integrity Authority Act to submit asset declarations.
- [136] Section 43(2) of the Integrity Authority Act also assigns to the Eligibility Committee the task of verifying annually, in respect of the persons proposed as President and Vice-President of the Authority, that no conflict of interest exists against them under the Integrity Authority Act, in respect of which, under Section 43(1), the persons concerned are required to make a declaration to the Eligibility Committee prior to their appointment. However, the law does not require the appointed President and Vice-Presidents to make a declaration to the Eligibility Committee that there are no conflicts of interest. In the view of the Eligibility Committee, these statutory provisions are by no means clear, since it is not apparent whether the President and Vice-Presidents are only required to make a conflict of interest declaration prior to their appointment or annually, and it is also unclear what potential outcome the legislator expects from the annual verification of the conflict of interest declarations of proposed but not yet appointed persons, since, by definition, no change can occur in these.
- [137] In relation to the fulfilment of the obligation to verify asset declarations and conflict of interest declarations, the Eligibility Committee also wishes to draw attention to a regulatory deficiency that constitutes a substantive obstacle to conducting the verification on its merits. Indeed, the Eligibility Committee has a statutory obligation to verify the content of the declarations; however, it cannot substantively fulfil this obligation, as it has no legal authorisation that would enable its members to access data in state, financial and other relevant registers. Consequently, the Eligibility Committee cannot even access information as simple as which real properties and motor vehicles are owned by the persons under review, in which companies they hold

interests, from which payers they received any income in the year in question, or the amount of their financial savings and investments.

VI. Material events occurring after the period under review

- [138] The Eligibility Committee became aware from the Prosecution Service's announcement that, on 16 January 2025, the President of the Integrity Authority was questioned as a suspect on charges of misappropriation committed to a significant value and abuse of office. On 13 February 2025, the Central Chief Prosecutor's Office for Investigations notified the President of the Integrity Authority of well-founded suspicions of further criminal offences. In addition to abuse of office, the Chief Prosecutor's Office for Investigations accuses the President of misappropriation totalling HUF 87 million. In relation to the prosecutorial investigation, the Eligibility Committee conducted no inquiry and made no findings.
- [139] In January 2025, the Authority's Board adopted the annual internal audit plan for the first time.
- [140] On 5 May 2025, the Authority adopted its 2024 Report prepared for the National Assembly.
- [141] On 27 March 2025, the Authority published its public procurement plan for 2025.

VII. Summary finding and limitation

- [142] The Eligibility Committee has endeavoured to ensure that, in terms of content, this review report covers to the fullest possible extent the first two years of operation of the Authority and the Authority's Board. During the review, the Eligibility Committee found that, in the first two years of operation, the President of the Authority and its Board laid the foundations for the Authority's functioning, and the Authority began to perform its tasks; however, the operation of the Authority and the Board cannot for the time being be regarded as mature or smooth in either quantitative or qualitative terms, as the details of this report point out.
- [143] Before finalising and publishing this report, the Eligibility Committee sent it to the President and Vice-Presidents of the Authority and afforded them the opportunity to submit any comments. The Eligibility Committee attaches the comments received as an annex to the report without modification. (See Annex 7 on the process of preparing the evaluation report)

VIII . Recommendations

VII .1. Recommendations for the Integrity Authority and the Board

VIII .1.1. Recommendations Concerning the Functioning of the Organisation

- [A.] To facilitate the smoother work of the Board, the Eligibility Committee recommends that the Board draw up its own rules of procedure and the missing internal regulations as soon as possible.
- [B.] The Eligibility Committee recommends that internal rules defining the competence of the Board should not be laid down in any regulation not approved by the Board (including even the Bylaws), and at the same time the Eligibility Committee recommends the repeal or approval by the Board of the provisions of the Bylaws that relate to the competence of the Board.
- [C.] The Eligibility Committee recommends that the Board primarily discuss the proposals submitted to it in meetings and adopt its decisions in meetings, and that written voting should take place only in cases where it is truly exceptionally justified.
- [D.] The Eligibility Committee recommends that the Authority lead by example and, in relation to its public procurements and other procurements, ensure full transparency and, to that end, also publish on its website procurements with an individual value below HUF 5 million, as well as contract amendments relating to such procurements.
- [E.] The Eligibility Committee recommends that, in carrying out its tasks, the Authority should strive not to outsource tasks but to provide for the conditions for ensuring its activities within its own organisation from its own budget, and that outsourcing should occur only in exceptional cases.
- [F.] The Eligibility Committee recommends that the Authority lead by example not only in the use of budgetary funds, but also in sound budget planning, and to commit significant budgetary envelopes only if their use can be reasonably and appropriately implemented in the given budget year.
- [G.] The Eligibility Committee recommends that, when fulfilling the public procurement obligation, the Authority, in applying Section 19 of the Public Procurement Act, should strive for a strict interpretation of the prohibition on splitting into lots. It further recommends that the Authority should not conclude indefinite-term contracts but, by using fixed-term contracts, should continuously ensure the possibility of competition for market participants.
- [H.] The Eligibility Committee recommends that the proportion of employees performing the Authority's actual professional work be higher than that of employees providing support functions.
- [I.] In matters of conflicts of interest and reputation, the Eligibility Committee recommends that not only prior to the conclusion of a contract, but also at the time of contracting and at specified intervals during the contractual relationship, any changes in the ownership structure of the company concerned or any negative news or events that have arisen be recorded and taken into account when assessing the business

relationship (e.g. dissolved companies appearing in the ownership structure, companies with a foreign ultimate owner, or newly established single-person business management consultancy companies).

- [J.] The Eligibility Committee recommends that the Bylaws expressly designate the Vice-President who exercises employer's rights over the President pursuant to Section 45(2) of the Integrity Authority Act.

VII .1.2. Recommendations Concerning the Activities of the Authority

- [A.] The Eligibility Committee recommends that the Authority develop clear methodological frameworks as to the cases in which it sends the draft of its report to the person or organisation under examination.
- [B.] The Eligibility Committee recommends that the Authority, in accordance with the provisions of the Integrity Authority Act, compile the register of legal persons, individual firms and sole traders excluded from public procurement procedures, and, in order to bridge any legislative shortcomings, conduct intensive consultations with the competent ministries.
- [C.] The Eligibility Committee recommends that the Authority draw up its methodological regulation regarding the prior dispatch of draft reports.
- [D.] The Eligibility Committee recommends that the Authority, in view of the jurisdictional rules laid down in Sections 32 and 33 of the Integrity Authority Act, should submit motions for revision and repeated motions for revision in individual cases only on the basis of an appropriate decision of the Board.

VIII .2. Legislative proposals

- [A.] In the opinion of the Eligibility Committee, it would be justified to define in detail, at the level of legislation, the scope of powers of the Board clearly, beyond the general provisions set out in Section 34 of the Integrity Authority Act. The Eligibility Committee, therefore, recommends appropriate clarification and supplementation of the Integrity Authority Act.
- [B.] The Eligibility Committee recommends clarifying the Integrity Authority Act so that the Act clearly determines which powers are exercised by the President of the Authority and which by the Board, either independently or shared with each other, in relation to the Authority's budget, financial management (including public procurement) and the direction of its internal audit.
- [C.] Should a regulatory obstacle arise, the Eligibility Committee recommends that the Government prepare and submit to the National Assembly the bills or amendment proposals that are necessary for the establishment and operation of the register of legal persons, individual firms and sole traders excluded from public procurement.
- [D.] The Eligibility Committee recommends that the National Assembly enact the

statutory provisions that are necessary for the Eligibility Committee to be able to fulfil its obligations under Sections 43 and 44 of the Integrity Authority Act concerning the verification of conflicts of interest and asset declarations.

- [E.] The Eligibility Committee recommends for consideration an amendment to the Integrity Authority Act which, for the Investigation procedure defined in Chapter III, Subtitle 7 of the Integrity Authority Act, establishes the statutory foundations of procedural safeguards (including in particular the procedural rights of the person or organisation subject to the procedure, and procedural deadlines).
- [F.] The Eligibility Committee recommends for consideration, modelled on OLAF, the establishment of a supervisory body whose task would be to monitor the application of the requirements of due process (controller of procedural safeguards).
- [G.] The Eligibility Committee considers it necessary to amend the Integrity Authority Act to create a clear regulatory position as to whether the President and Vice-Presidents of the Authority are required to make a conflict of interest declaration only before their appointment or annually,
and what potential outcome the legislator expects from the annual verification of the conflict of interest declarations of persons proposed for President and Vice-President but not yet appointed.
- [H.] In view of the fact that, in the opinion of the Eligibility Committee, the operational framework and internal relationships of the Authority and the Board cannot yet be considered mature, the Eligibility Committee recommends for consideration an amendment to Section 72 of the Integrity Authority Act, which would make the single review prescribed therein
regular on a defined schedule (e.g. annually or biennially).

Annex 4 – Provisions of the Organisational and Operational Regulations relating to the powers of the Board and their amendments

Statutory provisions	Presidential Order No. 1/2022 (XI. 18.)	Presidential Order No. 1/2023 (I. 23.)	Presidential Order No. 13/2023 (IV. 4.) and Presidential Order No. 17/2023 (VI. 8.)	Presidential Order No. 29/2023 (X. 5.)	Presidential Order No. 2/2024 (I. 31.)	Presidential Order No. 18/2024 (VI. 17.)	Presidential Order No. 23/2024 (X. 4.)
	<i>No such provision</i>	a) acknowledgment of the information on the annual and interim budget report and the final accounts	<i>deleted</i>				
	<i>No such provision</i>	b) acknowledgment of the information on the draft budget	<i>deleted</i>				
	<i>No such provision</i>	c) adoption of the itemised budget	<i>deleted</i>				
	<i>No such provision</i>	d) adoption of the annual public procurement plan	<i>deleted</i>				
	<i>No such provision</i>	e) discusses the overview of the Authority's quarterly operations, its activities and financial management	<i>deleted</i>				

<p>Section 57(5) The Authority's Board – taking into account the opinion of the Eligibility Committee – selects the members representing non-governmental stakeholders from the list of candidate members.</p> <p>Section 54(2) In accordance with the decision of the Authority's Board, the Chair of the Working Group invites the members representing non-governmental stakeholders participating in the work of the Working Group.</p>	<p>3. Taking into account the opinion of the Eligibility Committee, selects the members representing non-governmental stakeholders participating in the work of the Anti-Corruption Working Group</p>	<p>f) selects the members representing non-governmental stakeholders of the Anti-Corruption Working Group</p>	<p>a) selects the members representing non-governmental stakeholders of the Anti-Corruption Working Group</p>	<p>a) selects the members representing non-governmental stakeholders of the Anti-Corruption Working Group</p>	<p>a) selects the members representing non-governmental stakeholders of the Anti-Corruption Working Group</p>	<p>a) selects the members representing non-governmental stakeholders of the Anti-Corruption Working Group</p>	<p>a) selects the members representing non-governmental stakeholders of the Anti-Corruption Working Group</p>
<p>Section 58 (1) The mandate of the member of the Working Group representing non-governmental stakeholders terminates</p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>	<p><i>There is no provision in the Bylaws concerning a decision to withdraw the invitation.</i></p>

(...) c) by withdrawing the invitation, if the Authority's Board, on the proposal of the Chair of the Working Group , decides that the selection criteria are no longer met.							
	<i>No such provision</i>	<i>No such provision</i>	b) adopts the report on the integrity risk assessment	b) adopts the report on the integrity risk assessment	b) adopts the report on the integrity risk assessment	b) adopts the report on the integrity risk assessment	b) adopts the report on the integrity risk assessment
	<i>No such provision</i>	g) adopts the annual analytical integrity report	c) adopts the annual analytical integrity report	c) adopts the annual analytical integrity report	c) adopts the annual analytical integrity report	c) adopts the annual analytical integrity report, as well as the recommendations to be issued by the Authority	c) adopts the annual analytical integrity report, as well as the recommendations to be issued by the Authority
	<i>No such provision</i>	k) adopts the recommendations to be issued by the Authority	d) decides on the recommendations to be issued by the Authority	d) decides on the recommendations to be issued by the Authority	d) decides on the recommendations to be issued by the Authority	<i>incorporated in the previous section</i>	

Section 34 (1) The Board is the Authority's supreme decision-making body, whose members are the President of the Authority and its two Vice-Presidents.	4. It directs, coordinates and monitors the work of the organisational units belonging to the Authority's organisation.	<i>deleted</i>	<i>Deleted</i>	<i>Deleted</i>	<i>Deleted</i>	<i>Deleted</i>	<i>Deleted</i>
Section 34 (3) The Authority's Board reports annually to the National Assembly on its activities.	2. The Authority's Board shall report annually on its activities to the National Assembly and the European Commission.	h) adopts the annual report on the activities of the Board	e) adopts the annual report on the activities of the Board	e) adopts the annual report on the activities of the Board	e) adopts the annual report on the activities of the Board	d) adopts the annual report on the activities of the Board	d) adopts the annual report on the activities of the Board
	<i>No such provision</i>	i) decides, on the basis of the Integrity Authority Act, on the initiation of investigations proposed by the Investigation Office	f) decides, on the basis of the Integrity Authority Act, on the initiation of investigations proposed by the Investigation Office	f) decides, on the basis of the Integrity Authority Act, on the initiation of investigations proposed by the Investigation Office	f) decides, on the basis of the Integrity Authority Act, on the initiation of investigations proposed by the Investigation Office	<i>deleted</i>	
	<i>No such provision</i>	j) adopts the reports closing the investigations	g) decides on the reports closing the investigations	g) decides on the reports closing the investigations	g) decides on the reports closing the investigations	e) adopts the closing reports relating to the investigations as well as to the declarations of assets	e) adopts the closing reports relating to the investigations as well as to the declarations of assets

	<i>No such provision</i>	<i>No such provision</i>	h) regularly reviews the status of cases related to public interest disclosures, requests and complaints received by the Authority	h) regularly reviews the status of cases related to public interest disclosures, requests and complaints received by the Authority	h) regularly reviews the status of cases related to public interest disclosures, requests and complaints received by the Authority	<i>deleted</i>	
	<i>No such provision</i>	<i>No such provision</i>	i) decides on the initiation of procedures relating to asset declarations	i) decides on the initiation of procedures relating to asset declarations	i) decides on the initiation of procedures relating to asset declarations	<i>deleted</i>	
Section 75	<i>No such provision</i>	<i>No such provision</i>	j) decides on the ad hoc report relating to the asset declaration system	j) decides on the ad hoc report relating to the asset declaration system	j) decides on the ad hoc report relating to the asset declaration system	e) adopts the closing reports relating to the investigations as well as to the declarations of assets	e) adopts the closing reports relating to the investigations as well as to the declarations of assets
Section 8	<i>No such provision</i>	<i>No such provision</i>	k) approves agreements concluded in accordance with Section 8 of the Integrity Authority Act	k) approves agreements concluded in accordance with Section 8 of the Integrity Authority Act	k) approves agreements concluded in accordance with Section 8 of the Integrity Authority Act	f) approves agreements concluded in accordance with Section 8 of the Integrity Authority Act	
	<i>No such provision</i>	l) acknowledges the internal auditor's quarterly report on the audits carried out and may supplement the recommendations made by the internal auditor	l) acknowledges the internal auditor's annual report on the audits carried out and may supplement the recommendations made by the internal auditor	l) acknowledges the internal auditor's annual report on the audits carried out and may supplement the recommendations made by the internal auditor	l) acknowledges the report on annual internal audit activity	g) acknowledges the report on annual internal audit activity	g) acknowledges the report on annual internal audit activity

	<i>No such provision</i>	n) may make recommendations in connection with the internal auditor's work plan	m) may make recommendations in connection with the internal auditor's work plan	m) may make recommendations in connection with the internal auditor's work plan	m) may make recommendations in connection with the internal auditor's work plan	h) may make recommendations in connection with the internal auditor's work plan	h) may make recommendations in connection with the internal auditor's work plan
	<i>No such provision</i>	m) acknowledges the annual report of the Director of Professional Methodologies and Quality Assurance Inspections	n) acknowledges the annual report of the Director of Professional Methodologies and Quality Assurance Inspections	n) acknowledges the annual report of the Head of the Quality Management Office	n) acknowledges the annual report of the Head of the Quality Management Office	<i>deleted</i>	
	<i>No such provision</i>	o) acknowledges the annual report of the integrity adviser	o) acknowledges the annual report of the integrity adviser	o) acknowledges the annual report of the compliance adviser	o) acknowledges the annual report of the compliance adviser	<i>deleted</i>	
	<i>No such provision</i>	p) acknowledges the annual report of the data protection officer	p) acknowledges the annual report of the data protection officer	p) acknowledges the annual report of the data protection officer	p) acknowledges the annual report of the data protection officer	<i>deleted</i>	
	5. Ensures the personnel and other conditions necessary for operation	<i>deleted</i>	<i>deleted</i>	<i>deleted</i>			

	6. Performs all tasks which are not assigned by legislation, the Authority's Bylaws or another internal regulation to the competence of another organisational unit.	<i>deleted</i>	<i>deleted</i>	<i>deleted</i>			
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5. Annex 5 The Authority's public procurement procedures and consultancy-related contracts based on the data made available

Public procurement procedures initiated by the Authority in the period under review Source: www.ekr.gov.hu		
Filing number	Procedural regime	Subject-matter of procurement
Public Procurement Bulletin (PBB): 4594/2024, TED: 183341-2024, EPPS: EKR000144362024/H001	EU, Call for Tenders / Call for Participation	Procurement of data centre and user licences
PBB: 6720/2024, TED: 227535-2024, EPPS: EKR000144362024/H002	EU, Call for Tenders / Call for Participation	Procurement of data centre and user licences
PBB: 14320/2024, TED: 483827-2024, EPPS: EKR000144362024/H003	EU, Contract award notice	Procurement of data centre and user licences
PBB: 12814/2024, TED: 421974-2024, EPPS: EKR001222892024/H001	EU, Call for Tenders / Call for Participation	Supply of data centre equipment
PBB: 16520/2023, TED: 2023/S 164-519177, EPPS: EKR001427822023/H001	EU, Call for Tenders / Call for Participation	DPR office and user IT equipment
PBB: 6346/2024, TED: 210025-2024, EPPS: EKR001427822023/H002	EU, Contract award notice	DPR office and user IT equipment
PBB: 12131/2024, TED: 409813-2024, EPPS: EKR001427822023/H003	EU, Contract award notice	DPR office and user IT equipment
PBB: 0823/2024, EPPS: EKR001695982023/H001	National, Call for Tenders / Call for Participation	Building cleaning service
PBB: 4821/2024, EPPS: EKR001695982023/H002	National, Contract award notice	Building cleaning service
PBB: 25653/2023, TED: 782734-2023, EPPS: EKR002213572023/H001	EU, Social and other specific services – General public procurements	EU interest representation services for the IA
PBB: 1332/2024, TED: 48017-2024, EPPS: EKR002213572023/H002	EU, Social and other specific services – General public procurements	EU interest representation services for the IA
PBB: 6826/2024, TED: 230050-2024, EPPS: EKR002213572023/H003	EU, Social and other specific services – General public procurements	EU interest representation services for the IA
PBB: 10362/2024, TED: 352556-2024, EPPS: EKR000272872024/H001	EU, Call for Tenders / Call for Participation	Records management system and related services
PBB: 13119/2024, TED: 425917-2024, EPPS: EKR000272872024/H002	EU, Call for Tenders / Call for Participation	Records management system and related services
PBB: 17178/2024, TED: 576909-2024, EPPS: EKR000272872024/H003	EU, Contract award notice	Records management system and related services
PBB: 4463/2024, TED: 206544-2024, EPPS: EKR000314482024/H001	EU, Call for Tenders / Call for Participation	Procurement of communication services for 24 months
PBB: 15816/2024, TED: 533571-2024, EPPS: EKR000314482024/H002	EU, Contract award notice	Procurement of communication services for 24 months
PBB: 6219/2024, EPPS: EKR000589242024/H001	National, Call for Tenders / Call for Participation	MS Enterprise Product Support service
PBB: 10501/2024, EPPS: EKR000589242024/H002	National, Contract award notice	MS Enterprise Product Support service

PBB: 14108/2024, TED: 468964-2024, EPPS: EKR001312012024/H001	EU, Call for Tenders / Call for Participation	Server hosting service for 36 months
PBB: 15973/2024, TED: 527187-2024, EPPS: EKR001312012024/H002	EU, Call for Tenders / Call for Participation	Server hosting service for 36 months
PBB: 17695/2024, TED: 581912-2024, EPPS: EKR001312012024/H003	EU, Contract award notice	Server hosting service for 36 months
PBB: 19705/2024, TED: 663139-2024, EPPS: EKR002012322024/H001	EU, Call for Tenders / Call for Participation	Server hosting service for 36 months II
PBB: 25250/2023, TED: 784030-2023, EPPS: EKR002226952023/H001	EU, Call for Tenders / Call for Participation	Travel organisation services
PBB: 1220/2024, TED: 42572-2024, EPPS: EKR002226952023/H002	EU, Call for Tenders / Call for Participation	Travel organisation services
PBB: 7719/2024, TED: 260176-2024, EPPS: EKR002226952023/H003	EU, Contract award notice	Travel organisation services
PBB: 11950/2024, TED: 415107-2024, EPPS: EKR000981952024/H001	EU, Call for Tenders / Call for Participation	IT system supporting investigation processes
Other consultancy-related contracts sorted based on data provided by the Authority		
Contracting partner	Subject-matter of procurement	Contract value
2024		
Ernst and Young	Professional consultancy for the preparation of a public procurement procedure	HUF 14,187,500
Ifua Horváth és Partners	Strategy development, expert support	HUF 59,500,000
PWC	Finance-related expert services	HUF 14,820,000
Kürt Zrt.	Review of IT procurement and public procurement processes and data analysis capability	HUF 14,500,500
OECD	Development of methodology for assessing the public procurement system	EUR 150,000 = approx. HUF 60,000,000
Authentic-Audit Kft.	Financial and accounting consultancy	HUF 12,000,000
2023		
PWC	Data analysis	HUF 1,950,000
PWC	Valuation	HUF 1,400,000
PWC	Consultancy	HUF 1,750,000
Impact Works Kft.	Strategic communications and analytical support	HUF 6,350,000
Authentic-Audit Kft.	Financial and economic expert consultancy	HUF 11,811,024
Arlion Kft.	Consultancy service	HUF 11,811,000
L'azar Advisory Kft.	Performance of expert consultancy tasks	HUF 11,800,024
KPMG	IT consultancy	HUF 11,000,000
Sysman Informatikai Zrt.	IT operation, consultancy	HUF 12,000,000
Kantar Hoffmann Kft.	Research tasks	HUF 14,500,000

6. Annex 6 Remuneration of the employees of the Integrity Authority including allowances

		Average salary and other benefits/per capita	Headcount
2022	Q4	740,037.4667	5
2023	Q1	1,601,232.115	22.7
2023	Q2	1,521,042.917	56.1
2023	Q3	1,583,899.318	71.4
2023	Q4	2,157,076.291	78.9
2023	On average per month	1,715,812.66	
2024	Q1	1,463,035.543	89
2024	Q2	1,722,543.141	97
2024	Q3	1,612,938.73	100
2024	Q4	2,372,046.911	105
2024	On average per month	1,792,641.081	

Source: www.integritashatosag.hu

Annex 7 Process of preparing the evaluation report

