Eligibility Committee

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Dear Eligibility Committee,

Having regard to Section 72 of Act XXVII of 2022 on the control of the use of European Union budget funds ("Integrity Authority Act"), the Integrity Authority hereby stipulates the following points in relation to the Eligibility Committee's report titled "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" ("Report").

Firstly, the Authority emphasises that it takes into account all applicable legislation in its functioning, professional activities, and procurement processes. The Authority takes pride in having established, from scratch and without any prior foundation, a fully functioning organisation within a short period of time that has maintained its autonomy, independence, and objectivity, with its achievements now serving as professional points of reference. For this, we express our gratitude to our colleagues and cooperating partners.

The Eligibility Committee had nearly eight months to conduct it's review, whereas the President and Vice-Presidents of the Authority had only three and a half business days to provide their observations. An extension to this deadline was requested by both the Authority and the Board of the Authority, but these requests were then rejected by the Eligibility Committee without any justification. It is not clear to the Authority as to why, considering the summer vacation period, this deadline could not have been extended by at least a few additional business days, nor was any such reason mentioned by the Eligibility Committee. The Authority maintains that in the case of documents planned to be made public – such as the Report in question – it is especially warranted that the parties concerned are granted adequate time to provide their observations, and a deadline of three and a half business days is unreasonably short.

The Board of the Authority would have sought to issue a collective response, but the Eligibility Committee's approach outlined above made it impossible. The Authority highlights that, in line with Section 72 of the Integrity Authority Act, it is the functioning of the Authority and of the Board of the Authority – and not that of the President or the Vice-Presidents – that are

subject to review. Therefore, the Authority maintains that the Eligibility Committee's decision to provide only the President and the Vice-Presidents with the opportunity to submit their comments are not justifiable.

In light of these aspects, and while compelled to acknowledge the deadlines set by the Eligibility Committee, the Authority first presents its general observations and recommendations in relation to the Report, followed by its detailed observations concerning the individual sections. The Authority proposes that its comments on the individual sections not be included as an annex, but rather that the Report be structured in such a way that the Authority's position is presented alongside each finding of the Committee. This would allow comments on specific issues to be disclosed in a transparent and clear manner, thereby meeting the requirement for objective and fair communication of information.

General Observations and Recommendations

The Authority points out that in several locations, the Report presents findings only, without drawing any conclusions (such as in Sections [53], [54], [70], [70/A], [78]). According to the Authority, this could create the impression among the public that a specific finding constitutes some sort of objection, even though no objection or conclusion has been formally recorded. Furthermore, the Authority cannot establish either whether the Eligibility Committee wished to make any findings or not. The Authority finds this not only clearly misleading for the general public – which has access to less information than the Eligibility Committee – but also problematic in that it prevents the Authority from being in a position to build upon the Committee's position.

The Authority recognises the efforts made by the Eligibility Committee over a period of more than eight months, as well as the work it invested in preparing the Report. Nonetheless, the Authority finds it regrettable that despite its endeavours, efforts to engage in dialogue with three of the Committee's members proved to be unsuccessful. The Authority believes that such dialogue would certainly have been necessary, as it could have ensured the preparation of a report that is fact-based, accurate, legally well-founded, objective, and reflects a proper understanding and consideration of the context.

The Authority also shares the Eligibility Committee's position that several provisions of the Integrity Authority Act exhibit regulatory gaps and features regulatory content that the addressees find difficult to understand clearly. To address these concerns, the Authority has proposed legislative amendments on multiple occasions. This premise is also of key importance from the perspective of the Eligibility Committee's Report, as the Authority maintains that in the course of the review, findings may be regarded as favourable to the Authority if they are supported by legal references and substantiated by the legal

framework. This must be distinguished from findings based on the interpretation of the law. The Authority cannot confirm the appropriacy of such findings where normative content is unclear or entirely lacking.

Section 72 of the Integrity Authority Act stipulates that "The Eligibility Committee shall, in close cooperation and consultation with international organisations, review the functioning of the Authority and the Board of the Authority two years after the appointment of the members of the Board of the Authority." As outlined above, the legislature assigned a statutory requirement to the Eligibility Committee to carry out its review in close cooperation and consultation with international organisations. The fulfillment of this statutory requirement cannot be confirmed. The report issued to the Authority does not document close cooperation and consultation in the assessment process.

The Authority maintains that the legitimacy of the Report is highly questionable if the fulfillment of statutory requirements comes into doubt.

Consultation steps supported by data cannot be found in the document, nor is there any indication as to when the statutory requirement cited by the Eligibility Committee was narrowed down.

In Section [8] of the Report, the Eligibility Committee "interpreted cooperation and consultation with international organisations, as defined in Section 72 of the Integrity Authority Act, as being applicable only to the formation of the methodological frameworks, and not to the determination of the review's findings." Taking this into consideration, the Committee has, of its own initiative, narrowed down the interpretation of cooperation and consultation. Based on this, it cannot in any way be claimed that close cooperation and consultation, as required by the Integrity Authority Act, ever took place. Therefore, the Report fails to comply with the statutory requirement even with regard to the development of the methodological framework.

The Report shows only that the Eligibility Committee initiated cooperation with three organisations (Section [13]), but it does not show whether any consultations occurred or whether close cooperation and consultation ever took place. Two of those three organisations are mentioned only in this section, meaning there is no indication as to whether the opinions of these two organisations played any role in the preparation of the Report. Thus, it also cannot be confirmed whether the statutory requirement prescribing consultation with multiple international organisations was ever met (see the use of plural form in Section 72 of the Integrity Authority Act). Furthermore, the Authority asserts that only one of those three organisations qualify as an international organisation.

The text of the Report therefore does not substantiate close cooperation and consultation with international organisations. The Report does not provide any indication as to whether the Eligibility Committee actually fulfilled its obligation to engage in cooperation and consultation with international organisations, nor does it specify exactly how the Committee fulfilled this statutory requirement if it was fulfilled at all. These gaps in information are

important also because the obligation to engage in cooperation and consultation with international organisations is the only clearly defined obligation that the legislature assigned to the Eligibility Committee as part of conducting the review as defined in Section 72 of the Integrity Authority Act. Accordingly, the Eligibility Committee should have had to place more emphasis and provided more detailed information in the Report on how exactly it complied with this statutory requirement.

The Authority has requested on multiple occasions that the Eligibility Committee present its methodology. However, the Eligibility Committee has not furnished the Authority with any information regarding its methodology or the international organisations it engaged in consultation or close cooperation with.
From the Report itself, it can only be inferred that one organisation – namely the OECD – made a specific recommendation regarding the use of the MOPAN framework.
The Report does not establish whether MOPAN agreed to the application of MOPAN 4 – an unfinished methodology – nor does it indicate whether any consultation or cooperation ever took place with the organisation regarding the presumed restructuring and application of the methodology, or whether the preparers of the report received any training.
This is particularly problematic because the actual application of the MOPAN 4 framework – which is first cited in the Report – would have required the methodology to be communicated much earlier. Moreover, the methodology does not provide adequate foundation to assess the Authority, and its application cannot be considered warranted or appropriate, as explained later on.

The Report is inconsistent with the provisions of the Integrity Authority Act not only for the reasons set out above, but also because the Authority maintains that the Eligibility Committee has exceeded the statutory limits of its mandate. The Authority is an independent state administrative body, with its functioning subject to oversight only by competent authorities. A comprehensive review raises concerns about a potential violation of the prohibition on assumption of power and creates the possibility that the report by the Eligibility Committee could lead to the disclosure of conclusions and legal evaluations that contradict the findings of bodies authorised to carry out reviews.

The Authority considers it important to point out that in the course of its review, the Eligibility Committee asked questions in writing on multiple occasions and also held in-person hearings with members and some high-ranking public officials of the Board. The Authority responded to each data request within the specified deadlines, providing the Eligibility Committee with all the requested documents, data and records. Furthermore, the Authority's public officials appeared before the Eligibility Committee and responded to the questions to the best of their knowledge. Despite the Authority's proposal, no written minutes

were produced of the in-person hearings, which presumably contributed to the inclusion of inaccuracies in the Report that now inevitably require correction.

The Authority supports a transparent review of the functioning of both the Authority and the Board of the Authority, as well as the public disclosure of the findings. Nevertheless, the Authority draws the Eligibility Committee's attention to its responsibility to consider what sort of information regarding the Authority's internal operations should be made public, to assess which of the Authority's values such disclosure might violate, and to weigh its impact on national interests related to anti-corruption efforts. It is in the public interest that the Eligibility Committee's report provide authentic, objective, and fact-based information to the general public.

Detailed Observations

The Authority provides detailed observations concerning the Report, referencing its chapters and sections. Without taking these into consideration, conducting a well-founded review and preparing a report based thereon is not feasible.

I. Observations Concerning Chapter Titled "Objective and Subject of The Report"

[2] The correct number of the Decision of the President of the Republic referenced in the Report: Decision No 314/2022 of 4 November 2022 of the President of the Republic. As clearly shown in the Decision of the President of the Republic, the correct name of the Authority's President is Ferenc Pál Biró, which is to be corrected throughout the Report.

[10] The Report references that the Eligibility Committee requested an opinion from the National Authority for Data Protection and Freedom of Information ("NAIH"), recording that it was the position of the President of the NAIH that the Committee should make the report public. The Authority requested that the Eligibility Committee send them the inquiry issued to the NAIH, along with the response received thereto; however, the Eligibility Committee did not even respond to this request. In light of this, it cannot be confirmed whether the President of the NAIH issued his position after familiarising himself with the draft report, or whether he took a preliminary position on a matter of principle. Furthermore, the Authority is, as a matter of course, not familiar with either the inquiry or the position statement. The Authority points out that the stance of the President of the NAIH does not compensate for the lack of regulation in Section 72 of the Integrity Authority Act, which does not stipulate to whom and by what means the Eligibility Committee should communicate the report.

II. Observations Concerning Chapter Titled "Methodology for Preparing the Report"

[11] The Authority maintains that Section 72 of the Integrity Authority Act does not grant the Eligibility Committee statutory authorisation to conduct a comprehensive review. This cannot be legally justified by arguing that the Act "does not include restrictive provisions," considering that Section 72 of the Integrity Authority Act not only lacks restrictive provisions but leaves the scope of the review entirely unregulated, which is not disputed by the Eligibility Committee either. The Authority is an independent state administrative body, with its functioning subject to oversight only by competent authorities. The State Audit Office is responsible for overseeing compliance with the requirement for the responsible management of public funds, while the Public Procurement Authority is responsible for monitoring adherence to public procurement regulations. The Authority supports having the competent bodies and authorities take a position in the areas subject to control, thereby avoiding potentially contradictory professional findings.

[13] As seen above, the Authority expressed its position regarding the condition set out in Section 72 of the Integrity Authority Act, which requires that the review be conducted in close cooperation and consultation with international organisations. In this section, the Authority only makes references to its observations detailed in the "General Observations and Recommendations" section.

[14] To ensure that the findings in the Report are complete, the Authority also recommends adding that the Authority responded to all data requests within the specified deadlines, provided the Eligibility Committee with the requested documents and records, and that the Eligibility Committee's questions were answered by the Board of the Authority and the Authority's executives during in-person hearings.

[15] The Authority hereby notes that in-person hearings were also conducted with the involvement of individuals other than those indicated. The Authority's Head of Public Procurement and Procurement, as well as the Deputy Head of the Investigation Office, were also heard during in-person hearings.
The Authority points out that even the Eligibility Committee states that "during the interviews, only issues concerning the functioning of the organisation were reviewed; the Eligibility Committee did not request information regarding individual proceedings or investigations conducted by the Authority." The Authority notes that during the in-person hearings, the members of the Eligibility Committee asked questions regarding individual proceedings and investigations as well. No questions were asked regarding the quality of the Authority's professional activities; nevertheless, the Eligibility Committee specifically evaluates them using numerical data in Section [70]. The Authority notes that the tone of the in-person hearings were not always reflective of an objective and impartial review. These concerns were raised with the Eligibility Committee even during the assessment, requesting the

temporary suspension of the proceedings until the issues identified were sufficiently addressed.

[16]-[23] Developed by the Multilateral Organisation Performance Assessment Network (MOPAN), the MOPAN 4 framework is the updated version of MOPAN 3.1, designed primarily to assess the strategic, operational and results-oriented performance of multilateral organisations. The Integrity Authority, however, is an autonomous state administrative body whose tasks differ substantially from the functioning of multilateral organisations.

The MOPAN 4 framework was adopted at the MOPAN Steering Committee's session in May 2025 – several months after the Eligibility Committee claims to have used this framework to assess the Authority. The application of the updated framework is set to begin in 2026, as finalisation and the related methodological manual are expected to be completed only by the end of 2025. As highlighted both on the MOPAN website and the methodological guide titled "MOPAN 4 Framework and Analytical Guidance"[1], the (micro) indicators and the assessment manual have not yet been developed, raising concerns about the applicability of the MOPAN 4 framework to the assessment that was carried out.

The MOPAN framework was created specifically to assess multilateral organisations, and there is no publicly available information as to whether it has ever been used to assess national authorities or whether it can be considered specifically suitable for that purpose. The Eligibility Committee operates within a framework defined by Hungarian legislation, whereas MOPAN assessments use a performance-based rather than a legal approach. This fundamental difference makes the transposition of the framework impossible, and not even the selective application of methodological indicators can be considered theoretically or practically adequate.

Based on available information, MOPAN 4 conducts complex, five-dimensional analysis, scoring the performance of organisations using micro indicators. However, these indicators were originally designed for cases involving multilateral organisations. Because of this, the methodology cannot carry out a comprehensive assessment of the functioning of national authorities, as the assessment criteria do not align with the legal and functional requirements of the Authority. Most MOPAN indicators – such as efficiency in external partnership relations or results-oriented funding – are not relevant to the Authority's tasks defined by its legal status as an autonomous state administrative body. These tasks include, for example, assessing the integrity of the public procurement system or identifying corruption risks. Therefore, the framework does not provide an adequate foundation to assess the Authority, with its application considered neither warranted nor adequate.

The MOPAN assessment process is a strictly documented, four-stage, quality-assured procedure that requires significant resources and places strong emphasis on transparency throughout the entire process and on open communication. Transparency serves as its fundamental methodological principle: the methodological description, the indicators used,

[1] MOPAN_SC_2025_9_MOPAN 4 Framework and Analytical Guidance.pdf

the data collection process, and the criteria for selecting relevant stakeholders are all publicly available and are also shared with the organisations being assessed. The process is characterised by continued communication between the assessment team and the organisation at all stages, with the final report also reviewed by an external expert, thereby boosting the authenticity of the methodology.

Under the MOPAN 4 framework, stakeholder selection, selection criteria, documentation, and the informing of organisations are all conducted in line with a strictly defined and transparent procedure. This includes stakeholder analysis and partner reviews during which the selection of the selected participants is carried out in line with the relevance of collaborations, projects and prior experience. The organisation to be assessed is informed of the selection in advance and has the opportunity to expand or clarify the list.

During the assessment, the results of document reviews, partner reviews, and interviews are cross-checked, with evidence triangulated, thereby boosting the authenticity of the analysis and reducing potential biases. During the process of preparing the report – not just afterwards – the organisation has the opportunity to verify the facts, comment on the analysis, and provide additions, so that the final assessment reflects the objective reality to the greatest possible extent. Overall, the MOPAN assessment process is based on transparency, stakeholder involvement, and rigorous quality assurance procedures, all of which ensure the reliability of both the methodology and the final outcome.

Unfortunately, regarding transparency, stakeholder involvement, and quality assurance, the Authority did not observe full compliance with the above aspects in the assessment process of the Eligibility Committee.

[25] The report mentions that, alongside the MOPAN framework, the Eligibility Committee also applied the requirements of the ISO 37001 standard (anti-bribery management systems), as it addresses issues related to the functioning of individual organisations – such as those the Integrity Authority was established to uncover.

The requirements of the ISO 37001 standard primarily focus on the processes an organisation implements within its own operations to prevent and address corruption, aiming to establish a sort of self-monitoring internal management system. However, the Authority does not monitor itself, but rather monitors, assesses, and – where necessary – investigates integrity risks associated with other organisations. Therefore, applying the requirements of ISO 37001 to the assessment of the Authority's functioning constitutes a logical fallacy, as there is a fundamental difference between the purpose of the standard and the Authority's functions.

Applying the requirements of the ISO 37001 standard to assess the functioning of the Authority – especially alongside the MOPAN framework – is methodologically inconsistent, as the purpose, content, and scope of the two assessment frameworks are different. This may lead to distortions in the conclusions, recommendations and assessment presented in the report, as the assessment criteria do not align with the actual remit of the Authority.

However, evaluating compliance with the ISO 37001 requirements is also hindered by the fact that it cannot be determined from the Report which of its sections involved an examination of which specific requirements of the ISO 37001 standard, as the Report contains no such references or evaluations.

III. Findings Relating to Chapter Titled "General Findings on The Functioning of the Authority and of the Board Based on The MOPAN Framework"

[27]-[29] The Report gives the impression that the review was conducted professionally, following a defined, internationally accepted methodology. However, outside this section, the methodology is not traceable in the Report, and in fact, the content and methods used directly violate and contradict the stated methodology, which, among other things, requires procedural transparency and the involvement of stakeholders.
The Authority points out that the Report summarises its general findings based on the MOPAN framework in half a page, spread over three paragraphs.

[27] A finding in the Report which states that "During the entirety of the reviewed period, the Board operated without a formally elected chairperson" may lead to misunderstandings among the public, as it allows for the interpretation that the Board's operation without a chairperson is unlawful. However, under the applicable legal framework, such operation is actually not unlawful.
In accordance with Section 34(2) of the Integrity Authority Act, the Board is a collegial body of the Authority, and the provision defines only majority decision-making, without setting further conditions for its functioning.
The provisions concerning the Board under Section 34 of the Integrity Authority Act do not imply that the members of the Board are required to elect a chairperson for the Board to function.
As also noted in the Report, the members of the Board elected a presiding chairperson by a consensus decision at each of their meetings.

IV.1. Observations Concerning Chapter Titled "Findings Relating to The Functioning of the Board"

IV.1.1. Legal Provisions Concerning The Mandate and Functioning of The Board

[32]-[33] Section 33(1) of the Integrity Authority Act stipulates that the President of the Authority shall—

"a) head the work organisation of the Authority, determine in the organisational and operational regulations the organisation and core headcount of the Authority and the order of authentic copy issue;
b) represent the Authority;
c) exercise the powers assigned to the head of the office organisation under the Special Status Organs Act [Act CVII of 2019] or other Acts;
d) perform, with regard to the budget of the Authority, all the tasks conferred on the head of an organ in charge of managing a budget heading by the Act on public finances." Section 33(2) stipulates that "the president of the Authority shall exercise the powers referred to in paragraph (1) autonomously."
In accordance with Section 23(4)(c) of Act CXXX of 2010 on law-making ("Legislation Act"), the head of a central state administrative body may regulate the organisation, functioning, and activities of the bodies under their leadership, management, or supervision through normative instructions.
In accordance with Section 1(2)(c) and (4)(b) of Act XLIII of 2010 on central state administration bodies and the legal status of members of the government and state secretaries, the Integrity Authority qualifies as a central state administrative body in its capacity as an autonomous state administrative body.
The Authority asserts its view that the provisions of the Integrity Authority Act and the Legislation Act are to be interpreted to mean that the head of the Authority is independently authorised and required to regulate the functioning of the organisation under their leadership, including the tasks within its decision-making scope. The Authority, however, undertakes to thoroughly examine the legal interpretation put forth by the Eligibility Committee.
In light of these aspects, the Authority disagrees with the Eligibility Committee's interpretation of the law.
In connection with this point, the Authority also emphasises that it was the President of the Authority whom the Eligibility Committee called upon to make a statement, as is clearly evident from Section [14] of the Report.

IV.1.2. Rules of Procedure of the Board

[35] From the minutes made available to the Eligibility Committee it can be established why the rules of procedure were not adopted.

[38]-[39] During the oral hearings, the President of the Authority as well as the senior officials personally heard explained in detail that the written voting procedures were justified by organisational considerations relating to the functioning of the Authority (e.g. editing and publication circumstances), as well as the other duties of the members of the Board, and the volume of certain submissions (see annual report). During and prior to the written voting

procedures, members of the Board were afforded the same opportunity to make observations as at meetings. These were made available by the Authority to the Eligibility Committee together with the minutes.

IV.1.3. Bylaws of the Integrity Authority and Regulation of the Competence of the Board

[40] "The Bylaws of the Authority – as an internal regulatory instrument – take the form of a presidential directive (…)" In order to ensure the accuracy of the finding of the Report, the Authority proposes supplementing this by stating that the Bylaws constitutes an organisational regulatory instrument under public law pursuant to Section 23(4) of the Legislation Act, i.e. a normative order.

[41] "The Bylaws and its amendments were in all cases, with one exception, approved by the President of the Authority." The Authority requests supplementing this finding by noting that this was done in accordance with Section 23(4) of the Legislation Act. According to this provision, the head of a central administrative body, i.e. the President of the Authority, may independently regulate in a normative order the organisation, functioning and activities of the body under their leadership, direction or supervision.

[43-45] In the Authority's view, further legal provisions must also be taken into account when assessing the findings under these points of the Report. Pursuant to Section 23(4) of the Legislation Act, as well as Section 33(1) and (2) of the Integrity Authority Act, the President of the Authority may independently determine in the Bylaws the functioning of the organisation under their leadership, including the tasks falling within its decision-making competence.

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

[46] According to Section 8/A(2) of Act CXCV of 2011 on Public Finances, the deed of foundation and its amendments are issued by the founding body using the standard form prescribed by the Treasury. The Deed of Foundation was prepared on the basis of the relevant standard template.
Pursuant to Section 104(1) of the Public Finances Act, the Treasury is responsible for maintaining the register of budgetary bodies and thereby for the proper content in compliance with the requirements set out in law; the register is deemed an authentic public register.
In the course of the registration procedure of the Deed of Foundation of the Authority and its amendments, no shortcomings were identified in terms of its content or compliance with the law.

The Authority has fully complied with its obligations under the provisions of the Public Finances Act relating to the Deed of Foundation.

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

[49] As recorded in the Authority's reply of 13 March 2025 to the Eligibility Committee, Presidential Directive No. 18/2024 of 17 September 2024 on the Bylaws of the Integrity Authority regulates the issue of the initiation of investigations in line with Section 33(1)(a) and (2) of the Integrity Authority Act. The Authority's interpretation of Section 33(1) and (2) of the Bylaws is set out above, inter alia in the comments attached to Sections [43]-[45], which we do not wish to repeat here.
In addition, the Head of the Investigation Office of the Authority and the professional director provided the Eligibility Committee with a detailed oral explanation of the entire process for initiating investigative procedures. Pursuant to Section 17(1) of the Integrity Authority Act, the Authority initiates an investigation ex officio. This procedure does not constitute an administrative authority procedure within the meaning of the General Administrative Procedure Act, and therefore no administrative decision under the General Administrative Procedure Act is taken when an investigation is initiated. Accordingly, the Investigation Office of the Authority, on the basis of a report or ex officio information obtained, exercises its discretion in examining whether the conditions for initiating the procedure are substantiated. At the end of the investigation procedure, on the basis of the draft investigation report prepared under Section 19 of the Integrity Authority Act, the Board may assess whether the initiation of the investigation was justified, and it decides on this when adopting the report. Therefore, the finding in Section [49] of the Report is not correct, namely that since June 2024 the initiation of investigations has not been decided upon, since this is in fact considered during the decision-making on the report – together with the correctness of the assessments, findings and recommendations contained therein.

[52] As the Report itself also points out, Section 33(2) of the Integrity Authority Act expressly provides that the President of the Authority exercises independently, in relation to the budget, all the functions which the Public Finances Act assigns to the head of the body managing the budget chapter.

[54] The Authority does not agree with the view that the Board did not discuss the amendment of the annual report. The relevant submission to the Board presented the amendments, and the members of the Board cast their votes with knowledge of these, having been given the opportunity to make observations.

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

[65]-[66] In the Authority's view, in connection with these findings of the Report it is also justified to take further legal provisions into account. We refer back to what has already been recorded above, namely that Section 33(2) of the Integrity Authority Act expressly provides that the President of the Authority exercises independently, in relation to the budget, all the functions which the Public Finances Act assigns to the head of the body managing the budget chapter. Pursuant to Section 70(1) of Act CXCV of 2011 on Public Finances, "The head of the budgetary body shall be responsible for establishing internal audit, ensuring its proper functioning and guaranteeing its independence. The person or body performing internal audit shall carry out its activities directly subordinated to the head of the budgetary body, and shall submit its reports directly to the head of the budgetary body. […]"

IV.3. Findings Concerning the Functioning of the Authority

[67] The Authority does not agree with the finding that, compared to its initial functioning, the number of reports has decreased radically: in line with the information contained in the annual report, 178 reports were received by the Authority in 2023, while in 2024 the number was 172. The figures can further be explained by the fact that the increase observed at the end of 2023 was due to a reporting promotion campaign carried out by the Authority, which in 2024 was launched in December, and therefore its impact will be visible in the first quarter of 2025.

[68] Contrary to the summary contained in the Report, in the period under review (until 30 November 2024) the Authority concluded a total of 26 investigations, as can also be established from the section concerned of the Report itself, since it records that the Authority concluded 5 investigations in 2023 and 21 in 2024.

[70] The Report highlights that, as a reference, it reviewed publicly available information concerning the activities of peer authorities operating in other European countries – namely the Lithuanian STT (Specialiųjų Tyrimų Tarnyba), the Latvian KNAB (Korupcijas novēršanas un apkarošanas birojs), the Italian ANAC (Autorità Nazionale Anticorruzione) and the British SFO (Serious Fraud Office).
In its assessment, the Report compares the performance of the Authority to the current results of these institutions, and specifically refers to the statistics of the STT and KNAB.
Comparing the Authority's investigation statistics with those of the Lithuanian STT and the Latvian KNAB is not a reasonable comparison for a young Hungarian organisation established only at the end of 2022. There are several reasons for this, detailed below:
Both the STT and the KNAB have been operating for decades, with a stable organisational background, routine procedures and established networks. This allows their statistical results to reflect long-term activities. By contrast, the Authority is a young institution, still in the process of building its organisational structure, and its statistics primarily reflect the

limited results of the initial period. Limited organisational experience and the time required to establish processes mean that its performance cannot be compared with that of a mature and stable organisation.

It should also not be overlooked that, pursuant to Section 3 of the Integrity Authority Act, the Authority is obliged to act in cases where there is a failure on the part of an organisation vested with responsibilities relating to EU funds or their use or oversight, and that the Authority's responsibilities shall not affect the competences and powers of other bodies (Section 6 of the Integrity Authority Act). The limitations arising from these competence rules fundamentally call into question the validity of the comparison.

The STT and the KNAB traditionally possess broader and stronger powers. For example, the Latvian KNAB is entitled to take over criminal case files, conduct evidentiary measures, and its staff may even be authorised to carry and use firearms. The STT likewise has significant investigative and prosecutorial powers, including the right to initiate criminal proceedings directly. By contrast, the Authority currently has a far narrower scope of competence and, unlike the two aforementioned bodies, does not possess investigative or prosecutorial powers in the above sense.

It is also important to underline the difference in institutional goals and strategies. The STT and the KNAB are primarily tasked with fighting corruption, criminal prosecution and investigation, whereas the Authority, within its current powers, primarily fulfils a preventive and analytical role, which includes calling upon other bodies to initiate proceedings. Its institutional strategy reflects this. Because of these different objectives, statistical comparison does not provide a realistic picture of performance.

In addition to the above, the following should be highlighted concerning the specific statistics cited in respect of the STT and KNAB:

As regards the STT, the 277 identified offences referred to in the Report are 2023 data. According to the organisation's annual report[2], in 2024 a total of 283 offences were identified. This high number is partly the result of the 6 599 reports received by the STT that year, representing an exceptionally high rate of 235 reports per 100 000 inhabitants (compared to only 1.8 reports per 100 000 inhabitants in Hungary – a more than one hundredfold difference). It should be noted that in Lithuania whistleblowers reporting corruption to the STT may receive financial rewards[3] if the information provided helps detect or prevent a corruption offence, and the whistleblower is neither a suspect nor a witness in the case. In addition to the above, the comparison is made impossible by the wide spectrum of offences examined by the STT. Of the identified offences, 81% related to priority areas treated as such by the STT: state governance, regional policy and public administration (including local municipalities), as well as the financing of political parties and campaigns,

[2] https://stt.lt/data/public/uploads/2025/06/stt2024_ataskaitaen.pdf

[3] The amount of the reward depends on the importance and specificity of the information. For example, in 2022 the highest individual reward was EUR 2 500, and 57 persons received rewards amounting in total to EUR 40 000 – almost twice the amount of the previous year.

environmental protection, forestry, climate change, healthcare, national security and defence. Although misuse of EU funds is included in this statistic, it accounts for only a small proportion thereof. It should also be mentioned that in the same period the STT, established in 1997, employed a total of 279 staff.

According to its annual report[4], in 2024 the KNAB initiated 25 criminal proceedings, of which 13 were based on information obtained during operational activities, 5 on requests by natural or legal persons, 1 on information provided by the unit dealing with administrative offences, and the remainder from other sources. Most of the criminal proceedings were related to measures by state institutions, with only 5 relating to public procurement (no breakdown was published by source of funding, whether national or EU). The KNAB received a total of 1 760 reports in 2024 (of which only 677 were anonymous). It should also be noted that at the end of 2024 the KNAB employed 152 staff (out of 171 authorised posts).

A comparison of staff numbers adjusted for population clearly illustrates the significant differences in resources among the three organisations. In the case of the Authority, there are 0.84 staff per 100 000 inhabitants of Hungary, while the ratio is 8.4 at the Latvian KNAB and 10.0 at the Lithuanian STT. This shows that the KNAB and the STT operate with nearly ten times more staff per capita than the Authority. This difference partly reflects the variance in competences, powers and societal expectations, but is also an indispensable factor in comparing operational statistics.

In conclusion, it can be stated that comparing the Authority's investigation statistics with the current statistics of the Lithuanian STT and the Latvian KNAB is both unreasonable and misleading, since the competences, organisational maturity, operational environment, strategies and objectives of the three organisations differ fundamentally. The results of a young authority still in its formative stage cannot be fairly compared to those of long-standing organisations with strong powers and established practices such as the Lithuanian and Latvian anti-corruption bodies.

Furthermore, as recorded in the 2024 annual report, the Authority lodged 2 criminal complaints in 2023 and 9 in 2024 in connection with suspected infringements identified during its investigative procedures. Not every complaint lodged is published on the Authority's website, since even disclosing the fact of lodging a complaint may hinder subsequent related investigations.

[70/A] As already mentioned above, the Eligibility Committee did not formulate any questions with a view to gaining an understanding of the Authority's professional activities. Such communication would have clarified that the amount of EU funding affected by investigations in itself cannot provide a full picture of the Authority's professional activities. Most of the items referred to in this point cannot in fact form the subject of the Authority's investigations, as they are suspended and no funding decision has yet been taken in respect of these sources. It is also questionable and misleading to compare the amount of funding

[4] https://www.knab.gov.lv/en/media/7319/download?attachment

affected by targeted investigations to the total envelope of an entire programming period. This approach takes no account of the system-wide investigations initiated by the Authority, nor of those in which the Authority examines the activity of the competent body vested with powers, and it does not include supervisory inspections either. Contrary to what is set out in Section [70/A], the Authority's investigations concern numerous other EU funding sources, and therefore such comparisons are also questionable for this reason.

IV.3.1. Findings Concerning the Authority's Administrative Functioning

[71] As already communicated to the Eligibility Committee, the Whispli system records incoming reports and provides the Authority with access to them in such a way that, in the case of an anonymous report, only a technical identifier is transmitted to the Authority. No personal data are transferred to a third country (i.e. outside the European Union) or to an international organisation, and therefore there is no need to apply the provisions of Chapter V of the GDPR, since the place of data storage is within the territory of the EEA.
In the case of France, as an EU Member State, there is no transfer to a "third country"; therefore, Chapter V of the GDPR (international data transfers) is not applicable. The transfer of data qualifies as intra-EU data flow, which does not require a separate legal basis. Furthermore, the contract in force between the Authority and the service provider and its clauses adequately protect the interests of whistleblowers and of the country. The technical design and automation of the service enables the Authority to guarantee the anonymity of whistleblowers – should they wish to avail themselves of this option. In the view of the Authority, the methodology and software used comply with international best practice and with all applicable legislation. This is further demonstrated by the fact that several national authorities of EU Member States (e.g. the Portuguese competition authority) also use this system.
It cannot be established from the Report what "serious risk" the Eligibility Committee identified.

[73] The Authority has provided the Eligibility Committee with comprehensive oral and written information on the work of the Professional Directorate, repeatedly covering the procedural framework concerning investigations and their initiation. The Authority has not communicated to the Eligibility Committee any information suggesting that the decision to initiate an investigation is taken by the professional director of the Authority. The Authority acts in accordance with its Bylaws in relation to the initiation of investigations.
As explained to the Eligibility Committee, the functioning and structure of the Professional Directorate resemble the structure of organisations with a similar mandate – such as the Latvian anti-corruption authority, the KNAB, referred to in the Eligibility Committee's Report as a well-functioning example. The Authority concurs with the reference to KNAB as an

example and also draws attention to the OECD's country report on Hungary[5], in which the OECD explicitly recommended reflecting the operating model and powers of KNAB. The Authority further points out that the rules for initiating investigations are known and accepted in the Hungarian legal order and correspond to the mechanism of the Hungarian Competition Authority.
The Authority has provided this information to the Eligibility Committee.

[78] In the Authority's view, the finding in the draft report is misleading. The Authority has exhausted all means at its disposal, engaging in intensive consultations with the ministries responsible for regulation, and all parties are aware of the existing regulatory gaps. The Authority has set up its internal systems necessary for the performance of its tasks. Further steps for fulfilling its statutory responsibilities will only be possible once the legislative environment is amended, which lies beyond the Authority's influence. The Authority periodically (quarterly) provides information on these matters, inter alia at the meetings of the Monitoring Committee responsible for the implementation of the National Anti-Corruption Strategy (NACS), and in reports transmitted to the European Commission through the Ministry of European Union Affairs on the implementation of commitments undertaken in the conditionality procedure. The Authority has made these latter documents available to the Eligibility Committee.

[79] In the Authority's view, the finding in the Report is incomplete and therefore misleading. Pursuant to Section 5(5) of the Integrity Authority Act, the Authority performs the tasks laid down in the Government Administration Act in connection with the functioning of the Directorate of Internal Audit and Integrity (DIAI).
As regards the selection of staff employed within the DIAI, the Authority exercises two types of powers – approval and supervisory – under the Government Administration Act. In accordance with Section 29/B(6) of the Government Administration Act, the Authority, in 2024, carried out the review and approval of the objective criteria required for the selection of DIAI staff. Furthermore, in 2024 DIAI submitted to the Authority ten draft calls for applications for the purpose of reviewing and approving the objective criteria indicated among the selection requirements and advantages. In all cases, the DIAI took into account the Authority's observations and proposed amendments. In addition, in 2023 the Authority initiated two supervisory procedures under Section 29/B(6) of the Government Administration Act, covering a total of four calls for applications and the related selection procedures. These supervisory procedures were concluded in 2024 and the Authority prepared reports recording its findings, which were made available to the DIAI.
On the basis of Section 5(5) of the Integrity Authority Act and Section 29/B(9) of the Government Administration Act, the Authority carried out a review of the DIAI's functioning,

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[5] https://www.oecd.org/en/publications/a-strategic-approach-to-public-integrity-in-hungary_a5461405-en.html

examining the implementation of its rules of procedure and compliance with its operational guidelines. In the framework of this review, the Authority also assessed, inter alia through compliance checks, whether the organisational structures and internal regulatory instruments underpinning the DIAI's functioning had been established in accordance with the legal environment in force, and whether processes and controls supporting their implementation were in place. The review also covered the tasks assigned to each organisational unit in the rules of procedure, taking into account the expansion of the DIAI's responsibilities in 2023. The experience gained during the review provided support for the Authority's preparation for verifying the conflict of interest and interest declarations submitted by the DIAI's director and staff pursuant to Section 29/B (9c) of the Government Administration Act, which, as referred to in the Report of the Eligibility Committee, commenced in December 2024.

[80] In the Authority's view, the finding is incorrect. Pursuant to Section 5(6) and (7) of the Integrity Authority Act, in relation to asset declaration procedures the Authority has pointed out that the tasks carried out by the Authority are set out in its Special Report on Asset Declarations and in the 2023 Annual Report. Furthermore, the Authority has also indicated that in 2024 it continued and concluded the review – under Section 29(3) of the Integrity Authority Act – of the accuracy of the asset declaration submitted in 2023 by the Director-General of the authority auditing European funds (a review not identical to the asset declaration procedure under Section 5(6) and (7) of the Integrity Authority Act). However, as also indicated in the Case Report on Asset Declarations, this review was only partially feasible given the Authority's currently existing competences.

[82] In the Authority's view, the finding is incorrect. In accordance with the provisions of the Investigation Manual, compliance with rules on conflicts of interest and related interests, and the submission of a related declaration, are mandatory for all staff members involved in an investigation. This is laid down in Article 61 of the Financial Regulation of the European Union[6], in the Commission Notice on Guidance on avoiding and managing conflicts of interest under the Financial Regulation (2021/C 121/01), and in the Presidential Directive No. 9/2023. of 16 March 2023 of the Integrity Authority on the Authority's Code of Ethics. For additional detailed rules to be observed in connection with conflicts of interest and related interests, reference must be made to the Authority's Code of Ethics. The obligation to submit a conflict of interest and interest declaration applies in every investigation to all staff members involved. The Civil Service Regulations and the Code of Ethics were made available to the Eligibility Committee. These documents contain detailed provisions not only

[6] Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014 and (EU) No 283/2014 and Decision No 541/2014/EU, and repealing Regulation (EU, Euratom) No 966/2012

on conflicts of interest but also on divergences of interest and on the legal consequences thereof. The Eligibility Committee has not indicated any difficulties in interpreting these documents.

[83] The Authority provided its response on the issues raised by the Eligibility Committee on 20 January 2024. Both the Integrity Risk Report for 2023 and that for 2024 present the Authority's integrity risk practice and the methodology it applies. In fulfilling its statutory obligation, the Authority has demonstrably and in a documented manner engaged in close cooperation and consultations with the OECD.

[86]-[87] During the review period, the Authority issued two recommendations ex officio under Section 15(1) of the Integrity Authority Act outside the framework of an investigation procedure. In both cases, the public procurement procedure concerned by the recommendation was withdrawn, and therefore it was not justified to initiate proceedings under Section 15(4) of the Integrity Authority Act.

[89] In the Authority's view, the finding is misleading. Although there was one single case where the organisation addressed explicitly refused the Authority's request for the provision of data, in many other cases it occurs that the person or organisation addressed does not respond to the Authority's requests for data, even after repeated reminders, as also recorded during in-person hearing hearings. In the absence of effective sanctions, the Authority has no means of enforcing replies in such cases.

[90] Due to an administrative error, the Authority communicated incorrect data to the Eligibility Committee; consequently, the finding is incorrect. During the review period, under Section 18(2) of the Integrity Authority Act, the Authority requested on seven occasions that a body responsible for monitoring the use of European Union funds carry out evidentiary actions on its behalf. This figure also appears in the 2024 Annual Report.

[92] While in Section [12] of its draft report the Eligibility Committee notes that "the review of functioning did not, however, extend to examining the Authority's procedures or to evaluating them in any form", in Section [92] it nevertheless makes a finding on the quality of professional work. The Authority has not been informed as to what methodology and on the basis of which documents or data the Eligibility Committee makes a finding concerning the quality of professional work. The Authority emphasises that, under Section 19(2) of the Integrity Authority Act, it is not obliged to forward its report to the person or organisation concerned; the relevant section of the Act merely gives the Authority the possibility to do so. The legislator left it to the Authority's discretion to determine whether it deems the submission of the draft report for comments justified – in light of the individual characteristics of the investigation concerned, in particular the information uncovered, as well as the planned recommendations, measures and procedural initiatives. In this respect, the expectation of developing professional standards or methodology may be questionable.

In the course of such individual assessment, the Authority has identified as a relevant factor that professional considerations may weigh against sending the draft report to the person concerned (e.g. if the Authority files a criminal complaint, it would be contrary to the interests of the investigation for the suspected perpetrator to become aware of the Authority's findings).

[93] Due to an administrative error, the Authority clarifies that it has applied the legal instrument of suspension on three occasions.

[97] In the Authority's view, the finding is incorrect, as it contains erroneous data. The correct data for complaints filed as a result of investigation procedures are 2 in 2023 and 9 in 2024.

[98] In the Authority's view, the finding is incorrect, as it contains erroneous data. The correct data regarding competition supervision procedures initiated are 1 in 2023 and 3 in 2024.

[99] In the Authority's view, the finding is incorrect, as it contains erroneous data. According to the investigation reports in the review period, out of 26 investigations closed, in 17 investigations the Authority initiated irregularity proceedings with the competent managing authority, or – in the case of projects financed from the Recovery and Resilience Facility – with the national authority, in relation to a total of 26 suspected irregularities. On the basis of these initiatives, irregularity proceedings were launched in 19 cases.

[100] In the Authority's view, the finding is incorrect, as it contains erroneous data. In 2024, the Authority initiated proceedings before the Public Procurement Arbitration Board in 13 cases. (In 2023, in two matters, three requests for legal remedies were submitted, which the Public Procurement Arbitration Board registered as multiple cases and which resulted in four decisions in 2023 and, in January 2024, three further decisions.) In addition, in 2024 one further case was the subject of repeated proceedings before the Public Procurement Arbitration Board as a consequence of a judgment of the Budapest Metropolitan Court. Thus, the Arbitration Board listed the Integrity Authority as ex officio initiator in a total of 14 cases in 2024. As of the date of drafting the Annual Report, decisions have been made in 14 of the cases initiated in 2024, with violations found, at least partially, in 10 of them. As for the proceedings initiated in 2023, in which decisions were issued in 2024, the Public Procurement Arbitration Board found violations, at least partially, in all three cases.

[104] The Authority thanks the Eligibility Committee for raising this issue and will consider the possibility of changing its practice.

[114] The Eligibility Committee reports the fluctuation rate without evaluating it, and therefore the Authority considers it necessary to provide additional information. In

interpreting the Authority's staff turnover figures, it cannot be overlooked that the report covers the first two years of operation of a newly established organisation.
In the start-up period, different staff competences, attitudes and experiences are required for setting up an organisation than are needed in the case of an established body operating under normal procedures. For building up the organisation, the Authority relied primarily on internal resources to ensure the professional competences required (in line with the approach also recommended by the Eligibility Committee). As the organisation matured, certain competences were no longer necessary, while the provision of new competences became essential. This is reflected in the annual turnover figures: 38.4% in 2023 and 24% in 2024.
Within overall turnover, involuntary and voluntary departures were present in equal proportions in both years under review. The primary reason for involuntary turnover is the consistent and strict performance evaluation system applied by the Authority, and to a lesser extent the consistent enforcement of the requirements set out in the Code of Ethics.
In the case of an organisation rapidly built up from scratch, an initially high voluntary turnover is natural, particularly taking into account that a culturally hybrid organisation is being established, requiring adaptation and alignment from staff arriving from diverse backgrounds.
The Authority expressly supports young people in gaining experience and pursuing their career goals, whether within or outside the Authority. It always welcomes when talented young people, representing the Authority's values, enter the private sector or public administration.

[118] The Authority concurs with the Committee's finding; it has so far conducted its budgetary planning in line with these principles and will continue to do so.

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

[119] The Report erroneously refers to the Integrity Authority as the Public Procurement Authority; we recommend correcting this.
The Authority consistently endeavours to increase the number of public procurement procedures it reviews, in order to ensure the proper fulfilment of its growing capacities. In 2023 and 2024, the Authority assessed compliance with the prohibition of artificial splitting, taking into account technical and economic unity, the same immediate objective, and identical or similar use. The Authority thanks the Eligibility Committee for its observation and will conduct future reviews relating to the prohibition of splitting into lots with even greater care.

[121] In the Authority's view, the finding is incorrect. The Authority firmly rejects the statements made by the Eligibility Committee, according to which "serious conflict of

interest concerns arise regarding the Brussels Office and the circumstances of its establishment and foundation", on the basis of the facts available. Findings of such gravity can only be considered substantiated if they are supported by specific, verifiable facts, documents and examples, which the Committee's Report does not contain. The concerns expressed in the finding cannot be substantiated on legal, factual, or documentary grounds. All steps taken by the Authority are transparent, verifiable, and comply with the relevant legislation. The statements in the Report require further explanation and substantiation, or – should such not be available – their removal would be warranted.

[122] The Integrity Authority has not launched a negotiated procedure without prior publication, nor has it relied on grounds of urgency in any procedure.
An initiative to amend legislation cannot in itself be contrary to the law, since there is no prohibition either on making such initiatives or on amending legislation. It should be noted that, if such initiatives were indeed unlawful, as claimed by the Eligibility Committee, no legislation could ever be amended or repealed on the basis of such initiatives.

[124] In the Authority's view, the finding is incorrect. The average salary at the Authority, excluding Board members, was HUF 1 432 172 in November 2024 and HUF 1 414 725 in March 2025. The latter figure was transmitted by the Authority to the Committee in April 2025.
The Authority provides market-level salaries to its employees as a conscious strategic decision. This is for two fundamental reasons. First, a significant proportion of the necessary competences, experience and attitudes can only be secured from the private sector, consequently, the Authority, as an employer, competes for talent in that field. Second, the provision of competitive remuneration underpins the consistent expectation of high performance and facilitates the risk-free enforcement of the requirements set out in the Code of Ethics.

[125] In the Authority's view, the finding is incorrect. The staff of the Integrity Academy and the Communications Office perform professional tasks and should therefore be classified as such. In addition, professional activities include the development of systems supporting professional work within the IT Department, as well as the work of the International Relations Office.
Accordingly, the ratio of professional to operational staff is as follows:
2023: 70.73% professional, 29.27% operational
2024: 80.53% professional, 19.47% operational.
It is natural that, in the initial phase of a newly established organisation, the operational side is more prominent, as the basic operability of the organisation must be ensured. As the organisation develops, this foundation provides the necessary environment for professional activities, and the ratios naturally shift in favour of the professional side. Nevertheless, in the case of the Authority, the proportion of professional staff has been significant from the

outset, owing to the strong professional background and experience of its leadership.

[137] In this section, the Eligibility Committee seeks to highlight a regulatory gap that constitutes a substantive obstacle to the conduct of substantive verification. The Authority itself has encountered similar difficulties in relation to its obligation to verify asset declarations.

VIII. Recommendations

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

The Authority has taken note of the recommendations with gratitude and will examine the possibility of their implementation. At the same time, it considers it appropriate that the Authority's comments on the Report should also be taken into account when formulating the recommendations. On the basis of its preliminary review, the Authority has established that some of the recommendations of the Eligibility Committee have already been fulfilled and therefore require no further action on the part of the Authority.

VII.1.1. Recommendations concerning the functioning of the organisation

[H.] The recommendation has been fulfilled: the proportion of staff engaged in professional work is higher than that of staff providing support functions.

[F.] The Authority concurs with the Committee's finding and carries out its budgetary planning in line with these principles.

VII.1.2. Recommendations concerning the activities of the Authority

[A.]-[C.] The recommendations under points [A] and [C] are substantively identical. The Authority was unable to identify the reason why they appear as two separate recommendations in the Report. As set out above, the Authority already has an established methodology.

[B.] As the Authority has already demonstrated above, it conducts intensive consultations to ensure the functioning of the register of economic operators excluded from public procurement procedures.

[D.] As already indicated above, the Authority will examine the possibility of implementing the recommendation.

VII.2. Legislative proposals

[A.]-[H.] While the Authority is not the addressee of these recommendations, it appreciates that the Eligibility Committee also considers that legislative amendments would be necessary in connection with the Authority's remit. Given that changes in the regulatory environment are closely linked to EU expectations and commitments, it may be justified to inform and directly approach the legislator in relation to the proposed amendments.

The Eligibility Committee carried out its review – as stated in the Report – on the basis of the MOPAN4 methodology.
According to the MOPAN methodology, the evaluation is a collaborative process, the aim of which is to ensure that the findings are in line with the views and positions of the organisation evaluated and of the relevant stakeholders.[7] The methodology stipulates that, during the evaluation process, consensus should be sought at least at the level of findings, and the procedure should enable this. The formulation of recommendations based on the findings is the task of the evaluators, but these may subsequently be commented on by the organisation, and the organisation's feedback forms part of the final report. This practice ensures the transparency of the process, as well as the professional soundness and acceptance of the final outcome.
The Authority recommends that the Eligibility Committee take this approach into consideration in order to make the evaluation process even more effective and efficient, and to ensure that it is at least at the level of principles in line with the methodological framework set out.

Budapest, 3 July 2025

Ferenc Pál Biró
President

[7] „MOPAN assessments are rigorous, collaborative, and designed to ensure that findings resonate with the MO and its stakeholders." See: https://www.mopan.org/content/dam/mopan/en/publications/our-work/methods/mopan-3-1-methodology.pdf