REPORT TO THE HUNGARIAN PARLIAMENT

2025



INTEGRITY AUTHORITY

B/367

09. 2026

INTEGRITY AUTHORITY

We are dedicated to safeguarding the interests of current and future generations, promoting a cleaner and more lawful economy, and building greater social trust.

By focusing on prevention, investigation, and shaping social attitudes, we ensure that funds are used efficiently and in compliance with regulations.

We perform our duties in line with our core values: honour and integrity, service and determination, professionalism and teamwork.

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Presidential foreword



Ferenc Pál Biró
President

Honourable Members of Parliament,

I am hereby submitting the 2025 Report of the Integrity Authority to a Parliament whose composition has changed significantly. Many of you are encountering the Authority's work and mandate, as well as the professional foundations underpinning the new anti-corruption institutional framework, for the first time. Therefore, in addition to the detailed annual report, I would also like to provide a brief, informative overview of the Integrity Authority's mission, how the organisation has evolved over the past three years, and the role it can play in the political and institutional environment now being shaped by the new National Assembly.

The political shift following the 2026 elections, Hungary's accession to the European Public Prosecutor's Office (EPPO), the establishment of the National Asset Recovery and Protection Office (NVVH), and the constitutional re-regulation of the definition of public funds could together mark a new starting point for the fight against corruption. Over the past three years, the Authority has been built from scratch and has now become one of the most important professional watchdogs overseeing the use of EU funds: a data-driven, internationally recognised, autonomous state administrative body.

Following the political changes in 2026 and a decision by the National Assembly, the Authority will assume new statutory responsibilities, ranging from the review of asset declarations and EU-funded defence procurements to strengthening the anti-corruption ecosystem. Meanwhile, Hungary is joining the European Public Prosecutor's Office and the National Asset Recovery and Protection Office is also commencing operations.

A few weeks ago, the Integrity Authority published its Annual Integrity Report, which, for the fourth consecutive year, draws the attention of decision-makers and the professional and political spheres to systemic problems in the handling of public funds and highlights the need for comprehensive reform in this area.

In light of all this, the Integrity Authority's role is not just to be another institution but to serve as a professional driving force and coordinating centre for the system as a whole.

Building a data-driven authority from scratch

When it was established at the end of 2022, the Integrity Authority started its operations with a limited statutory framework, modest infrastructure, and a small professional staff. After three years, however, the Authority is reporting to the National Assembly as a data-driven organisation with artificial intelligence-based investigative capabilities.

Between 2023 and 2025, the Authority—

- launched 77 investigations and closed 47 investigation procedures;
- identified more than HUF 320 billion worth of European Union funding at risk;
- initiated 69 irregularity proceedings with managing authorities;
- submitted 50 requests to the Public Procurement Arbitration Board, resulting in public procurement procedures worth over HUF 48 billion being subject to legal remedy;
- submitted 23 motions for revision, with an exceptionally high success rate;
- reviewed hundreds of notifications, which led to present at the conference of investigations, administrative measures and public follow-up.

All of this was achieved through prudent financial management, as a result of which the Authority returned a total of nearly HUF 29 billion to the central budget in 2024–2025, while the actual cost of our operations remained at around HUF 5–6 billion. In short, the Authority managed to protect public funds worth many times more than it cost taxpayers.

Hungarian innovation, a European-level knowledge centre

The Integrity Authority is now recognised internationally as a leading professional institution. Over the past five years—

- we signed a cooperation agreement with the anti-corruption authority of Hong Kong (ICAC);
- we have played an active role in the work of international anti-corruption networks;
- we were present at the Conference of the State Parties to the United Nations Convention against Corruption, as well as in the professional working groups and forums of the OECD, OLAF and the IAACA;
- the President of the Authority was invited to join the Executive Committee of the IAACA;
- furthermore, the Authority has been an active member of the European Network for Public Ethics (ENPE) and, together with the Italian and French authorities, co-hosted the organisation's annual general assembly and conference.

According to feedback from our international partners, the Integrity Authority is one of Europe's pioneer centres in integrity-based, data-driven approaches to combating corruption. A strong symbol of this is the EUR 600,000 in TSI support provided by the European Union, which supports the development of AI-based predictive tools for the Authority's investigative system. The project is being implemented by the Authority in collaboration with the colleagues and professional support of the OECD.

The Integrity Academy, the integrity management courses at the University of Debrecen, and the 47 educational events held in 2025 all demonstrate that the Authority not only monitors and investigates but also builds: attitudes, professional capacities, and a new generational integrity culture.

Building institutional capacity

The greatest deterrent against corruption is not the mere severity of penalties but the speed, inevitability and consistency of holding those responsible to account. This is also supported by criminological research: while both the severity of sanctions and the inevitability of their application matter, the deterrent effect is reinforced most strongly by the speed with which consequences follow.

The aim of the Integrity Authority's work is to ensure that the conditions for certainty are met in as many cases as possible. Thanks to our data-driven risk analysis, we launch timely investigations that have a substantive impact, while also providing expert recommendations, submitting motions for revision to the courts, and cooperating with investigating authorities, the Public Procurement Arbitration Board and managing authorities.

Today, we use an AI-based monitoring and evaluating system with nationwide coverage, capable of analysing thousands of public procurement documents, grant decisions and contracts in a structured manner using a consistent methodology. It is thanks to this that by the end of 2025, the Authority's focus had increasingly shifted toward large, networked and high-value cases, while our recommendations and initiatives in smaller cases are already shaping practice.

A coordination role in the new anti-corruption ecosystem

In the years that follow, Hungary's anti-corruption system will gain three new pillars: accession to EPPO, the establishment of the NVVH, and the re-regulation of the constitutional definition of public funds. They will be successful only if they operate as members of a well-coordinated, well-tuned orchestra, rather than as independent or rival "soloists".

There are three reasons why the Integrity Authority is well placed to be a key voice in this orchestra.

We have a data-driven insight into the risks associated with the use of EU funds, the state of competition in public procurement, and typical shortcomings. This, on the one hand, enables us to detect risks early, and on the other hand, to identify similar patterns in past cases of abuse.

Our network of institutional connections covers managing authorities, control bodies, law enforcement authorities, and international partners.

Our professional independence and our commitment to the rule of law ensure that our recommendations, motions for revision, and investigations apply the same standard to everyone.

My request and proposal to the National Assembly is therefore simple: let us build the new anti-corruption ecosystem in such a way that the Integrity Authority can discharge its functions with a strengthened coordinating mandate, on a fund-neutral basis, covering both domestic and EU funds.

This way, we can bridge the gap between the oversight of domestic and EU funds, standardise the rigour of oversight, and further strengthen the protection of domestic funds.

The reporting obligation of the Integrity Authority and other autonomous oversight institutions can be truly effective only if it functions as a complete cycle: the institution makes clear recommendations in its reports, Parliament discusses them, the Government takes action, and the way public funds are used actually changes. This cycle was not complete in the past: the Government often rejected our recommendations without substantive justification, and even when it formally agreed with them, it did not take any further action.

This is why I am asking the National Assembly – and this is also one of my greatest hopes for the new parliamentary cycle – not only to safeguard the Authority's independent mandate but also to strengthen it, and to turn this interaction into genuine dialogue and cooperation through regular, substantive engagement and consistent follow-up.

Strategic directions

In the years ahead, zero tolerance for corruption and the unlocking of EU funds are both economic and moral objectives. In this context, the Integrity Authority is not a secondary player but a potentially key institution – a trusted safeguard for Hungarian society, Hungarian taxpayers and our European partners.

The Authority's internal institutional strategy names three societal impacts: the "whitening" of the economy, the efficient use of European Union funds, the shaping of social attitudes, and the strengthening of trust. These objectives directly align with the priorities of the government cycle. Therefore, in the upcoming period, the Authority's task is not merely to maintain its existing operations but to strengthen them in three key areas.

First: we will further strengthen targeted, impact-based investigations. The 2025 Report also shows that the Authority is most effective not when combating corruption in general but when focusing on clearly identifiable, recurring risk patterns, especially in public procurement involving EU funds.

Second: we will continue to build data-driven, AI-supported risk analysis capabilities. The Integrity Authority started developing its monitoring system and innovative solutions as early as 2023 and, since 2025, has benefited from the active professional support of the European Commission and the OECD, with the aim of strengthening the transparency and integrity of the use of funds. This is the capability that makes the Authority a truly modern anti-corruption institution, equipped with rapid and predictive capabilities.

Third: a culture of integrity must be strengthened at the societal level as well. The Integrity Academy's strategy makes it clear that the Authority not only monitors and investigates but also intends to educate, raise awareness, conduct research, and shape norms. This is particularly important for establishing a lasting institutional culture in the period ahead.

Integrity cannot be a disadvantage

Behind the numbers and processes presented in the report lies a guiding principle, which is also my main message to the National Assembly. Being a person of integrity should not be a disadvantage in Hungary.

Through its investigations, recommendations, motions for revision, educational programmes, and international relations, the Integrity Authority works to ensure that the honest majority does not feel that it is being disadvantaged by the system, either in public life or in the economy; that people can once again trust the state; that institutions operate credibly; and that it is clear that their decisions genuinely serve the public interest.

The Integrity Authority's statutory responsibility is to carry out high-quality oversight and analytical activities in the areas of EU funds, public procurement, and integrity risks, thereby contributing to the prevention and detection of corruption. In accordance with applicable legislation, the Authority is required to apply the same professional standards in all cases, irrespective of political affiliation. Within its statutory mandate, the Authority

cooperates with the legislature, the government, law enforcement, and the judiciary in protecting whistleblowers, providing education, and building a culture of integrity.

Support from the National Assembly is key to ensuring these functions are discharged effectively. We need powers and a mandate that make it clear that the Integrity Authority is a key institution in a state governed by the rule of law, and not merely a formal symbol of anti-corruption efforts.

I ask that you consider our 2025 Report as the first milestone of a shared, long-term project, and let us work together to ensure that accountability, integrity, and honesty are not the exception but the norm in Hungary.

Budapest, 31 July 2026

Ferenc Pál Biró
President

Key indicators of the Integrity Authority

INVESTIGATIVE TASKS IN 2025





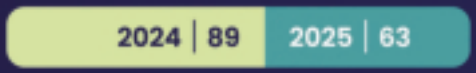
EU funding involved



Initiating proceedings following investigations

Complaints filed		HCA proceedings		PPAB proceedings		Irregularity proceedings (investigation closed / initiative)	
2024	2025	2024	2025	2024	2025	2024	2025
9	4	3	3	13	27	21	41

Number of recommendations issued upon completion of investigations:



Administrative audits

Administrative audits in public procurement

Audits conducted		Suspending audited public procurement procedures		Initiating proceedings with the Public Procurement Arbitration Board	
2024	2025	2024	2025	2024	2025
8	14	3	4	4	7

Initiating proceedings with other bodies (other)

Motions for revision



Decisions assessed





Staff number

31 December 2024
113 people

31 December 2025
129 people



Discharge of functions by the Integrity Authority

1.1 The Authority's functions

This chapter presents the Authority's tasks, as specified by the Integrity Authority Act and other acts. The figure below presents four distinct areas (investigative, administrative, analytical, and audit tasks) in table format.

Investigative functions and powers

- *may conduct* **investigation procedures**
- **may call upon** *organisations with functions and powers related to the control of the use of European Union funds* **to initiate proceedings,** *may initiate proceedings* **with other bodies**
- **may bring** *before the court* **actions** *for failure to act and other actions*

Administrative authority powers

- *conducting* **administrative audits** *in connection with public procurements financed or planned to be financed, in part or in whole, from European Union funds*
- *may impose an* **obligation to provide information** *in connection with public procurements financed from European Union funds*
- *maintaining a* **register** *of legal persons, individual firms and private entrepreneurs who are* **excluded**, *in connection with certain criminal offences, from public procurement procedures*

Analytical and proposal-making tasks

- *issuing an* **analytical integrity report** *annually*
- *issuing* **recommendations** *on an annual or ad hoc basis*
- *preparing* **integrity risk assessments**

Audit tasks

- **supervision of the DIAI**
- *checking* **DIAI and DGAEF conflict-of-interest** *declarations*
- *checking certain* **declarations of assets**

1.2 The functioning of the Authority's Board

The Board of the Authority is the main decision-making body of the Authority that is composed of the president and two vice-presidents of the Authority.

The Board of the Authority, as the supreme decision-making body, may adopt decisions related to the exercise of the Authority's functions and powers as a body, by majority vote.

In 2025, the Board of the Authority held 11 in-person board meetings and made decisions on 9 occasions through written voting procedures. The Board adopted 45 decisions. In addition to decisions affecting the Authority's overall functioning, the following are particularly noteworthy:

- The Board adopted two decisions approving the Authority's report and its annual analytical integrity reports,
- the Board adopted decisions on 19 reports closing investigation procedures, as well as on initiating proceedings with other bodies included therein, and, on one occasion, it adopted a decision on an analytical report,
- on 5 occasions, decisions were adopted regarding the application procedure and selection of members of the Anti-Corruption Task Force, representing non-governmental actors;

1.3 The functioning of the Authority's Professional Directorate

The operation of the Authority's Professional Directorate is one of the cornerstones of the organisation's professional activities, ensuring that its statutory duties are performed consistently, transparently, and to a high standard. The Directorate's activities are founded on the unity of strategic management, professional coordination, and operational implementation, enabling the Authority to respond effectively to continuously evolving risks and challenges.

In recent years, the Authority has demonstrated outstanding operational performance and efficiency, as reflected in both the growing volume and the increasing complexity of its investigative activities. The professional work overseen by the Directorate has strengthened the Authority's capacity to identify risks associated with the use of European Union funds across an increasingly broad range of areas and with growing professional expertise, while contributing to their effective management.

Professionalism, cooperation, and the implementation of innovative solutions are central to the Directorate's functioning, and together they underpin the reliability and effectiveness of the Authority's activities. The work of the Directorate makes a significant contribution to the transparency, compliance, and efficiency of the use of European Union funds, thereby strengthening confidence in the sound management of public funds.

1.4 Investigative functions and powers

The procedural powers of the Authority are the following: investigation procedures of the Authority[1] (1.4.1), initiation of proceedings with organisations with functions and powers in relation to the use, or the control of the use, of European Union funds (1.4.2), initiation of proceedings with other bodies (1.4.3), and the right to bring legal proceedings (1.4.4). The Integrity Authority Act links all of the Authority's powers to its investigative function in the broader sense.

The objective of the investigation procedures is to identify circumstances or risks that adversely affect or may adversely affect the sound financial management of the European Union budget or the protection of the European Union's financial interests.

In the context of the Authority's powers and obligations relating to the initiation of proceedings, the purpose of an investigation, in the broad sense of the term, is to

- establish whether an organisation with functions and powers relating to the use of, or the control of the use of, European Union funds has failed to fulfil its obligations or failed to take the necessary steps, where such omission statutorily warrants action by the Authority.
- It also seeks to determine whether any risk falling within the scope of Section 3 of the Integrity Authority Act can be identified that either justifies the intervention of another competent body or
- provides grounds for the Authority to initiate legal proceedings.

1.4.1 Investigation procedures by the Authority

Investigation procedures
The Authority's investigation procedures may be substantiated by an infringement or infringements identified on the basis of the reports and, in the case of ex officio initiation, the Authority's autonomous integrity risk analysis and assessment.

The Authority's investigation procedure is aimed at identifying circumstances that adversely affect or may adversely affect the implementation of EU financial support. Investigation procedures are not considered public administrative proceedings, and no administrative judicial review may be brought in respect of the Authority's activities in this regard. Therefore, these are autonomous procedures to which the provisions of the General Administrative Procedure Act do not apply. It follows from this that the fact-finding and evidentiary tools provided for under the administrative procedural framework are not available to the Authority.

The Authority can only rely on the voluntary cooperation of the individuals or entities contacted through requests for information or data provision in the course of investigation procedures, as failure to comply with the statutory obligation to provide information has no further legal consequences (e.g. procedural fines), which, therefore, ultimately undermines the effectiveness of investigation procedures.

[1] *Article 7 of Chapter 3 of the Integrity Authority Act*

In the course of its investigation procedures, the Authority's powers are limited to issuing requests for the provision of data and assessing publicly available information. Acting on its own authority, it may not carry out evidentiary measures to ascertain the relevant facts. Instead, it may request competent organisations (typically the managing authority responsible for the project concerned) with powers to control the use of European Union funds to carry out such measures and report back on the results of the fact-finding process, including the manner in which the facts were established.

In 2025, the Authority launched 31 investigation procedures and closed 19 investigations (in 2024, 25 investigation procedures were launched and 21 were closed). The total amount of EU funding concerned by the investigations launched in 2025 was HUF 217.1 billion, while the amount of EU funding concerned by completed investigations was HUF 50.5 billion.

As of 31 December 2025, a total of 37 investigation procedures were ongoing, involving EU funding amounting to a total of HUF 320.4 billion (31 December 2024: HUF 113.5 billion).

Overall, it can be concluded that, compared to the previous year, the value of the projects and the funding subject to the Authority's investigation procedures have increased. Alongside a minimal decrease in the number of completed investigations, both the complexity of the completed investigations and the number of administrative audits (see Chapter 1.6.1), as well as the amount of European Union funding involved in investigations in progress at the end of the year, have increased significantly compared to the previous year.
In 2025, the volume and complexity of investigative activities increased, resulting in the Authority conducting more complex investigations compared to previous years.

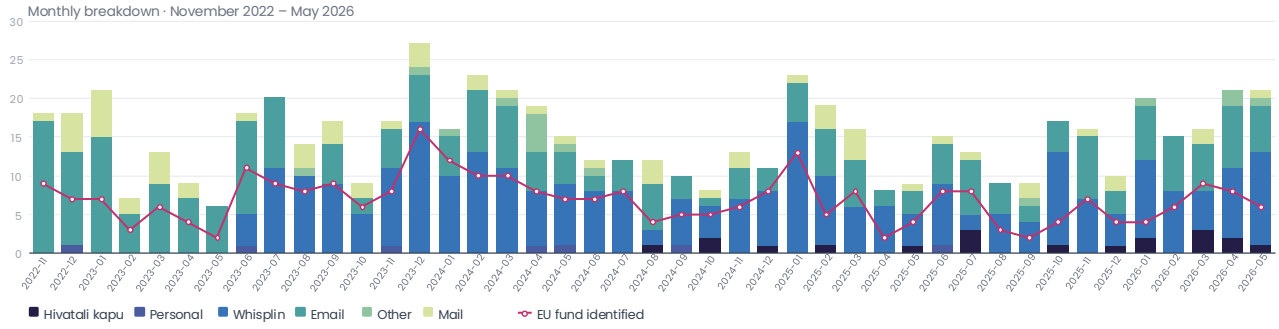
Number of reports received by the Authority

In accordance with Section 4(4) of the Integrity Authority Act, with a view to receiving reports and complaints, the Authority shall maintain a reporting interface that ensures the anonymity of reporting persons and complainants and enables confidential communication.

Anonymous reporting platform

Since its establishment, the Authority has ensured that anyone who detects an infringement falling within the Authority's remit can report it via the dedicated email address, at bejelentes@integritashatosag.hu. In June 2023, the Authority also launched an anonymous abuse reporting system accessible through its website, enabling reports to be made concerning corruption, fraud, and conflicts of interest related to European Union funds.

Distribution of notifications by channel of receipt



In addition, the Authority also accepts public interest reports via the Official Gateway (Hivatali Kapu), by post, by telephone (+36-1-293-0967), or even in person by prior appointment.

In 2025, the Authority received 164 reports (172 reports in 2024), of which 55 came in via email, 84 through the anonymous reporting interface, and 25 through other platforms.

Of all the reports received, 68 (41% of the total) concerned European Union funds and could therefore potentially fall within the Authority's remit (while the remaining 96 reports fell outside of the Authority's remit).

Out of 68 reports concerning the use of European Union funding, an administrative audit was ordered in 1 case, and investigation procedures were initiated in 15 cases.

In 6 of the remaining 52 reports, data collection was ongoing during the investigation forming the basis for the handling of the report as of 31 December 2025, while in 46 cases, there were no grounds for initiating investigations based on the information provided in the reports.

In accordance with point 5.1(c) of the action plan for the implementation of the Medium-Term National Anti-Corruption Strategy for 2024–2025, adopted by Government Decision No 1025/2024 of 14 February 2024, and in order to ensure transparency, the Integrity Authority shall publish on its website the key information related to whistleblower reports following the conclusion of their investigation, while ensuring the anonymity of reporting persons as necessary.

To ensure the continuous performance of this function, the Authority implemented the necessary measures on 1 November 2025; and as a result, the outcomes of the investigations into a total of 26 public interest reports closed in November and December 2025 were published on the Authority's website under the year 2025.

Investigative tasks in 2025

On 1 July 2025, the Authority introduced its IT system supporting its investigative activities, which uniformly records all procedural steps in a structured manner, from the registration of reports to the comprehensive monitoring of initiated procedures arising out of investigations, ensuring their transparency and traceability. When the system was introduced, data relating to all closed and ongoing cases from the establishment of the Authority up to the system's go-live date were migrated. As a result, the Authority now has a unified, integrated case management system and database accessible through a central platform. This IT solution enables comprehensive and structured data management of investigation cases, as well as the documentation and traceability of individual procedural steps.

The operation of the system makes a significant contribution to enhancing the administrative support of investigation processes, strengthening consistent practices across procedures, and increasing the efficiency of organisation-wide data and process management. The structured data management environment has improved the transparency and accessibility of information, while also enhancing analytical capabilities and management decision support. In addition, the investigation software facilitates the more efficient organisation and optimisation of workflows.

Number of investigations closed:	**Number of investigations launched:**
2024: 21	2024: 25
2025: 19	2025: 31

EU funding concerned

Total amount of EU funding concerned by investigations launched in 2025: **HUF 217 135 389 570**

Total amount of EU funding concerned by investigations closed in 2025: **HUF 50 586 073 740**

Total amount of funding concerned by investigations ongoing at the end of 2025:
HUF 320 447 107 740
Initiating proceedings following preliminary assessments, investigations and administrative audits:

Number of recommendations issued upon completion of investigations:
2024: 89
2025: 63

Complaints filed:
2024: 9
2025: 4

PPAB proceedings:
2024: 3
2025: 3

HCA proceedings:
2024: 13
2025: 34

Initiating irregularity proceedings:
2024: 26
2025: 41

Number of administrative audits initiated in 2025: 14
concluded with the initiation of review procedures: 7
investigation procedures launched: 1 (as a result of two administrative audits)

1.4.2 Initiating proceedings with an organisation with functions and powers in relation to the use, or the control of the use, of European Union funds

In exercising its investigative functions and powers, the Authority may call upon organisations with functions and powers related to the control of the use of European Union funds to initiate proceedings. Thus, in particular, it may request an organisation with functions and powers related to the control of the use of European Union funds to carry out evidentiary measures on its behalf.

The Authority, together with the competent managing authorities, participated in seven on-site audits as part of the investigation procedures conducted in 2025.

Out of the 19 investigations that were completed, the Authority initiated a total of 36 irregularity proceedings with the competent managing authority in 12 cases.

The status of the 36 irregularity proceedings initiated as of the date of preparation of this report is summarised in the table below:

No irregularity occurred	1
Irregularity occurred; the managing authority withdrew from the contract	3
Irregularity occurred; the managing authority applied a financial correction	6
Irregularity proceedings were suspended because of an other authority's ongoing proceedings (e.g. Public Procurement Arbitration Board)	3
Irregularity proceedings in progress	15
The Authority received no information on the status of the irregularity proceedings since their initiation	8
Total:	36

Moreover, the Authority initiated a further five irregularity proceedings with the competent managing authorities upon completion of the investigations conducted to assess the reports received.

1.4.3 Initiating proceedings with other bodies

Initiating proceedings with the Public Procurement Arbitration Board

Where the Integrity Authority identifies a suspicion of a public procurement law infringement in the course of its investigations, it may refer the matter to the Public Procurement Arbitration Board, which is a nationwide administrative review body with jurisdiction to adjudicate public procurement disputes.

The number of referrals submitted by the Authority has shown a steady increase in recent years. While the Integrity Authority submitted three referrals in 2023 and 13 in 2024, in 2025 it already referred 34 cases to the Public Procurement Arbitration Board.

In 2025, the Public Procurement Arbitration Board issued decisions in 34 of the cases initiated during the year. In 2025, the estimated value of the public procurement procedures and procurements covered by the decisions of the Public Procurement Arbitration Board exceeded HUF 25 billion. Based on referrals submitted by the Integrity Authority, the Public Procurement Arbitration Board identified infringements in 32 cases and imposed fines totalling nearly HUF 100 million.

Ten court proceedings were initiated in connection with decisions issued following referrals submitted by the Integrity Authority. As of the publication of this report, one of these cases has been finally concluded with a judgment favourable to the Integrity Authority.

1.5 Initiation of contentious proceedings

In 2025, the Authority acted as the claimant or an interested party in 15 administrative court proceedings, 8 of which are still ongoing in 2026. Of the seven administrative court proceedings concluded with a final and binding decision, the Authority prevailed in six cases, either as the claimant or as an interested party, and lost one case.

The significance of the decision lies in the fact that the court upheld the Authority's argument that, in themselves, numerical correlations between bids submitted by competing bidders in a public procurement procedure may be sufficient to establish the likelihood of a competition law infringement, thereby triggering, in the present case, the Hungarian Competition Authority's obligation to initiate competition supervision proceedings. The Authority initiated an administrative proceeding against the Ministry of Energy, considering that its request for data provision under the Integrity Authority Act had been declined. As of 2026, the proceedings are still ongoing.

The Authority exercised its right to bring legal proceedings more extensively than in previous years. All of this was related to the increase in the number of the review procedures initiated with the Public Procurement Arbitration Board, as well as the strengthening of the professional activities of the Authority.

1.6 Administrative authority powers

1.6.1 Administrative audit

The Authority also carries out investigations into public procurement procedures funded by the European Union as part of administrative audits within the meaning of the General Administrative Procedure Act. Therefore, in such proceedings, the Authority acts in its capacity as an administrative authority. In doing so, the Authority may also order the suspension of the procurement procedure under audit for a period of two months.

In 2025, the Authority launched administrative audits in 14 cases (compared with eight in 2024) and also exercised its option to suspend public procurement procedures on four occasions. The Authority initiated proceedings with the Public Procurement Arbitration Board in connection with five administrative audits, and the Board registered the referrals as seven separate cases. In two cases, the Authority initiated an investigation procedure acting within its own powers. Based on the administrative audits of the Integrity Authority, the seven review procedures initiated with the Public Procurement Arbitration Board concerned public procurement procedures worth more than HUF 23 billion. The Public Procurement Arbitration Board identified infringements in each of these review procedures and imposed fines exceeding HUF 50 million.

1.6.2 Register of entities excluded from public procurement procedures

Chapter IV of the Integrity Authority Act imposes on the Authority the obligation to keep a register of economic operators excluded from public procurement procedures. In exercising such powers, the Authority will also act in its official capacity and carry out the registration procedure ex officio, but where it becomes aware of the data giving rise to the opening of the registration procedure on the basis of a complaint or report, it has the obligation to issue a request to the competent authority. The registration obligation applies to those legal persons, individual firms and sole traders who are subject to a ground for exclusion from public procurement procedures due to certain specified serious criminal offences.

As the Authority has previously stated, it requires data to perform its register maintenance function; however, it encountered obstacles in accessing these data again in 2025.

The Authority is entitled to direct data link regarding the data of the company information system, the individual entrepreneur register, the beneficial owner register system, and the criminal records system. However, during consultations, the Authority concluded that the legislation also requires the transfer of data from the company information system that are not available in the company register (such as the mother's name and place of birth of a member of the supervisory board). Accordingly, the Authority proposed a legislative

amendment to the Ministry of Justice. As part of the same initiative, the Authority also highlighted further legislative obstacles related to record-keeping, as well as the resulting practical difficulties in data transfer.

As a result of the proposal for the legislative amendment, Act LXVI of 1992 on the Registration of Personal Data and Residential Addresses of Citizens ("Records Act") was amended, and the Authority was authorised from 1 January 2026 to receive the data referred to in point b) of section 17(2) of the Records Act from the personal data and address register, except for data specified by law.

Based on the above, it can be concluded that, in the absence of an adequate legislative framework, the conditions necessary for the Authority to commence its record-keeping activities were still not in place in 2025. The Authority sought to identify legislative obstacles through consultations with the bodies responsible for maintaining the register and to formulate proposals that could promote the adequacy of the legislative framework governing the maintenance of the register.

The Authority's work scheduled for 2026 will be influenced by the fact that, according to Act III of 2026 on the implementation of tasks originating from the cooperation agreement between the Government of Hungary and the Hungarian Chamber of Commerce and Industry, from 1 January 2027, the Hungarian Chamber of Commerce and Industry will be the body responsible for maintaining the register of sole traders instead of the National Tax and Customs Administration.

1.6.3 Recommendations

According to Section 15 of the Integrity Authority Act, the Authority may issue recommendations to contracting authorities on the basis of a report or complaint, at the request of the contracting authority, or ex officio prior to or during the conduct of a public procurement procedure that is partially or wholly implemented or planned to be implemented with European Union funding. In this context, the Authority may, among other things, require the use of a particular type of public procurement procedure or a specific procurement method, as well as the cessation of unlawful conduct. If the contracting authority does not act according to the recommendation, it is subject to an obligation to provide reasons. Based on the recommendation, the Authority may initiate proceedings before the body vested with the relevant functions and powers.

The Authority issued 22 recommendations in 2025. Based on the recommendations, the contracting authorities cancelled their procedures in 3 cases, they declared their procedures unsuccessful in 2 cases, and the contracting authority revised its call for tenders in accordance with the recommendation in 1 case. Due to the rejection of recommendations by contracting authorities, the Authority initiated 8 administrative audits (four of which in 2026), resulting in 4 Public Procurement Arbitration Board proceedings in 2025. In each of these review procedures, the Arbitration Board found infringements committed by the contracting authorities concerned. Due to the disregard of its recommendation, in one case the Authority notified the intermediate body involved in the use of European Union funds.

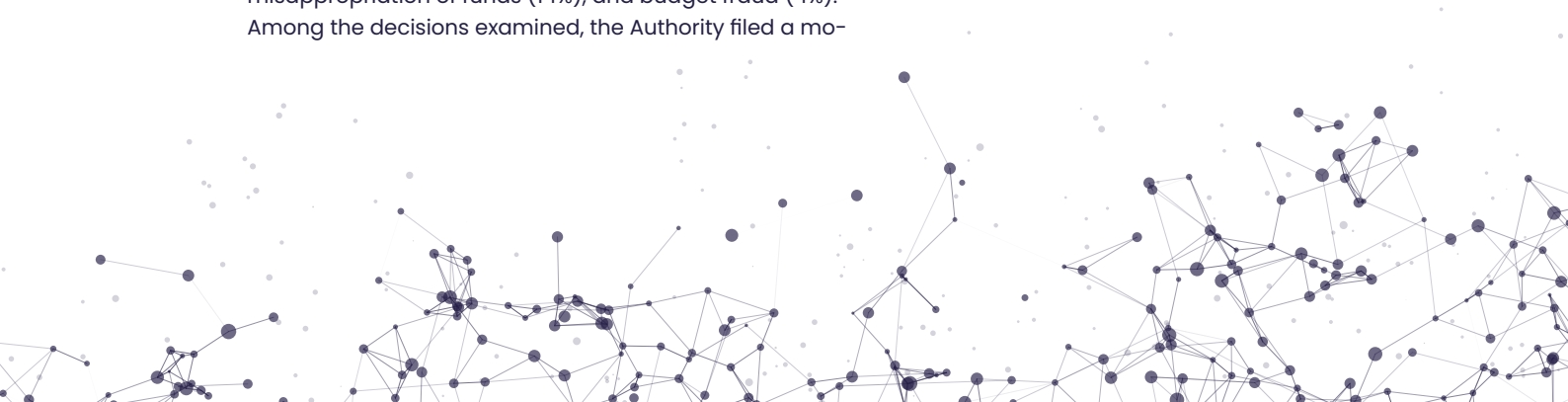
1.6.4 Motions for revision

The Authority is entitled to submit a motion for revision in accordance with section 27/A of the Integrity Authority Act and the provisions of Section 817/C (7) of Act XC of 2017 on the Code of Criminal Procedure, if the public prosecutor's office or the investigating authority rejects a complaint filed for a special criminal offence related to the exercise of public authority or the management of public assets, or terminates the procedure within one month of the public disclosure of this anonymised decision.

In 2025, the Authority processed a total of **760 anonymised decisions**, of which 57% were adopted and published by the public prosecutor's office, 39% by the police, and 4% by the National Tax and Customs Administration. In 68% of the decisions, the investigating authority dismissed the complaints, while in the remaining 32%, it decided to terminate the procedure.

These figures differ significantly from those of previous years: In 2023, the investigating authority concerned rejected the complaint in 91%, while in 2024, in 79% of the anonymised decisions processed by the Authority; this proportion therefore shows a downward trend year by year.

In the published anonymised decisions, the three most common criminal offences were abuse of office (66%), misappropriation of funds (14%), and budget fraud (4%). Among the decisions examined, the Authority filed a motion for revision in **5 cases** between 1 January 2025 and 31 December 2025, of which 3 cases also involved the use of European Union funds. In **3 cases, the competent prosecutor's office granted the Authority's motion for revision**, annulled the decision of the investigating authority, and ordered the continuation of the proceedings. These investigations were ongoing at the end of 2025. **In one case**, the decision concerned by the motion for revision was received by the Central District Court of Buda, having jurisdiction over the matter. **The court granted the Authority's motion for revision**, and annulled the decision of the investigating authority. Therefore, by court order, the investigation was launched without a separate decision, and was still ongoing at the end of 2025. In one of the cases concerned by the Authority's motions for revision, the competent public prosecutor's office, acting within its supervisory powers, annulled the unlawful decision of the investigating authority, and ordered an investigation – thereby bypassing a substantive assessment of the Authority's motion for revision. **Similarly to 2024, none of the motions for revision submitted by the Authority in 2025 were rejected by the respective authorities having jurisdiction over the matters concerned.**



1.6.5 Complaints filed

In accordance with Section 24(1) of the Integrity Authority Act, the public official of the Authority is subject to a reporting obligation under Section 376(2) of Act XC of 2017 on Criminal Procedure if, acting within their powers, they become aware of a criminal offence subject to public prosecution.

In 2025, the Authority filed complaints with the competent investigating authority on four occasions (compared to nine occasions in 2024), informing the European Public Prosecutor's Office and the European Anti-Fraud Office in accordance with Section 24(1) of the Integrity Authority Act, while simultaneously delivering the complaints to the public prosecutor's office, as well.

1.7 Analytical and proposal-making remit

1.7.1 Drafting reports

As part of its operations, the Authority performs analytical and proposal-making functions, involving regular and ad-hoc reporting obligations as specified in the Integrity Authority Act.
The Authority publishes its reports on its website in the cases specified in the Integrity Authority Act.

In its reports, the Authority formulates recommendations with the aim of advocating, among other things, improvements to Hungary's public procurement and European Union funding systems.

On 30 June 2025, the Authority published its Annual Analytical Integrity Report for the third time, in which it assessed the control system for European Union funds, the efficiency of public procurement regulations, and analysed the available public procurement data.

The Authority formulated 42 recommendations in the report, 12 of which concerned audit systems, 4 addressed centralised public procurement, 24 were directed at public procurement procedures (beyond centralised public procurement), while 2 focused on data analysis. The Government sent its response to the Authority within the deadline regarding the recommendations, agreeing with four, and partially agreeing with seven recommendations. The Government accepted a further seven recommendations, while considering that no further action was warranted. It accepted the legitimacy of the purpose of ten recommendations, but did not consider any action warranted. It disagreed with 18 recommendations. (The Government divided the Authority's 42 recommendations into 45 issues.)

1.7.2 Review of draft legislation

In 2025, the Authority was not involved in the administrative consultation process related to the draft legislation specifically affecting the powers of the Authority, nor in the reviewing process of the draft legislation concerning public procurement or the use of European Union funding.

1.8 The Authority's audit functions

1.8.1 Tasks related to selecting the employees of the Directorate for Internal Audit and Integrity (DIAI)

With regard to the selection of staff employed by the DIAI, the Authority has approval and supervisory powers under the Government Administration Act. The approval powers were exercised in accordance with the legal provisions, the selection procedure effective from 1 August 2024, as well as the cooperation agreement between the DIAI and the Authority.

In 2025, the Authority reviewed and approved the objective criteria for selection. The DIAI sent drafts for a total of 19 calls for tenders for approval, and, in every case, the body took into account the Authority's comments, which were also incorporated into subsequent calls.

1.8.2 Verification of conflict of interest declarations and declarations of interest

Pursuant to Section 5(4) of the Integrity Authority Act, the Authority verifies the conflict-of-interest declarations made by the employees of the body auditing European Union funding and those of the Directorate of Internal Audit and Integrity, in accordance with the provisions laid down by law.

In accordance with Section 29/B(9) of the Government Administration Act, the Director and employees of the DIAI are required to submit a general conflict-of-interest declaration and a declaration of interest upon the establishment of their legal relationship. Then, prior to the initiation of any substantive procedural actions, they must also submit a case-specific conflict-of-interest declaration for the relevant procedural action.

In relation to the Directorate General for Audit of European Funds, the DGAEF Act confers additional control functions

on the Authority concerning the Director General and Deputy Director General of the DGAEF. According to Section 28(6) of the DGAEF Act, the nominees for the positions of Director General and Deputy Director General must declare that there are no grounds for conflicts of interest in their case, as defined by the same act. Section 28(7) of the DGAEF Act provides that the Integrity Authority shall annually verify the accuracy of the declaration referred to in Section 28(6), as well as the existence of any conflict of interest after the appointment.

In 2025, the Authority conducted the compliance review of the conflict of interest declarations and declarations of interest of the Director-General and employees of the DIAI, as well as those of the Director General, Deputy Director General, and employees of the Directorate General for Audit of European Funds.

The objective of the review – based on the provisions of Section 5(4) of the Integrity Authority Act., Section 29/B(9c) of the Government Administration Act and Section 28(7) of the DGAEF Act – is to determine whether the information contained in the conflict of interest declarations and declarations of interest of the Director General and Deputy Director General of the DGAEF, as well as those of the Director of the DIAI and the employees of these organisations, is accurate. The review is also intended to determine objectively whether the integrity of the declarant being audited is or could be compromised due to their personal or economic relationships. The period covered by the review included the calendar years 2023 and 2024.

Following the completion of the review, the draft report(s) recording the review findings were prepared in the spring of 2026.

1.8.3 Verification of asset declarations

In 2025, in accordance with Sections 29(2)-(4) of the DGAEF Act, the Authority performed the functions of the management, preservation and publication of the asset declarations of the Director General and Deputy Director General of the body auditing European Union funding. The Authority published the asset declarations submitted by the deadlines of 31 December 2024 and 31 December 2025 on its website.

In 2025, the report on the external compliance review conducted regarding the asset declaration submitted by the Director General of the DGAEF by the deadline of 31 December 2023 was approved and issued. The report was submitted to the Director General of the DGAEF. During the review, based on the asset declaration form and its content, the Authority identified the external parties called upon to provide data. These external parties were state administrative/public administration bodies, as well as credit institutions[2].

In the case of credit institutions, the Authority continues to regard it as a significant risk that data covered by banking, securities and insurance secrecy has been furnished exclusively on the basis of a written authorisation executed by the person subject to the inspection in the form of a private document having full probative value. Furthermore, the respective types of information covered by banking, securities and insurance secrecy have had to be clearly identified, pursuant to the relevant legislation[3].

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[2] *Credit institution: bank, specialised credit institution and cooperative credit institution based on the Guidance for completing asset and income declarations and declarations of economic interest under Annex 1 to Act XXXVI of 2012 on the National Assembly.*

[3] *Section 118(2)(a) of Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities*
Section 161(1)(a) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises; Section 137(a) of Act LXXXVIII of 2014 on Insurance Activity

Because of a legislative gap concerning credit institutions and financial service providers, the Authority does not have general powers for requesting information protected as banking, securities, insurance, and fund[4] secrecy. In the absence of these powers, information that would enable the verification of the accuracy of financial data with reasonable certainty could not and cannot currently be fully available; the Authority could and can only draw conclusions and make proposals based on the data provided in the asset declaration and the data provided on the basis of an authorisation granted in a private document having probative value. The legislative deficiencies are contrary to the proper exercise of the oversight powers conferred on the Authority.

At the end of 2025, the Authority initiated the verification of the asset declarations submitted by the Director General of the DGAEF on 30 January 2024 and 8 January 2025, as well as the asset declarations submitted by the Deputy Director General of the DGAEF on 15 May 2024 and 31 January 2025. The verification activity will be continued and closed in 2026.

No circumstances, as specified in Sections 5(6) and (6a) of the Integrity Authority Act, arose in 2025 that would have warranted the Authority's verification of the asset declarations of additional groups of individuals, as defined in the same Act. Neither did the limitations on access to the data described above led to the identification of any risks. Therefore, no verification procedures for other individuals' asset declarations were initiated, and no procedures for the verification of asset declarations were commenced under Section 5(7) of the Integrity Authority Act.

1.9 International relations and collaborations

The following provides a summary of the status of the Authority's international network and activities as of 31 December 2025, and presents the main directions for future development and collaborations.

1.9.1 International cooperation

From the outset, the Authority has sought to establish connections with partners that contribute internationally recognised best practices and proven expertise to the fight against corruption.

It was in line with this approach that the Authority signed a cooperation agreement in September 2025 with Hong Kong's Independent Commission Against Corruption (ICAC), which is a leading global actor in the fight against corruption. The agreement covers, among other things, professional workshops, conferences, joint training initiatives, and the sharing of risk analysis methodologies.

In June 2025, ICAC experts made a working visit to Budapest, where they presented international best practices in corruption prevention through interactive training, practical examples, and case studies, with particular emphasis on involving society and strengthening the anti-corruption mindset.

[4] *Banking secrecy: based on the Guidance for completing asset and income declarations and declarations of economic interest according to Annex 1 of Act XXXVI of 2012 on the National Assembly: they do not fall within the category of credit institutions. Relevant legal provision regarding data provision: Section 40/B(2)(a)(aa) of Act XCVI of 1993 on Voluntary Mutual Insurance Funds*

1.9.2 International conferences

An **active international presence** is central to the Integrity Authority's international strategy. Participation in recognised international conferences and professional forums enables the Authority to present its institutional activities and priorities to a wider international audience.

European Network for Public Ethics (ENPE)

ENPE is a professional network comprising independent authorities of the European Union's member states, responsible for the integrity of the public sector. Its mission is to strengthen the integrity and transparency of the public sector, support the enforcement of the rule of law, prevent corruption, and promote good governance in EU member states.

It is a significant professional recognition and a sign of serious international trust in the Authority that on 16–17 October 2025, Budapest and the Integrity Authority were able to host the ENPE annual conference. The central theme of the event was conflict of interest, an issue whose proper management is key to strengthening public trust in institutions at the European level, preventing integrity risks, and ensuring the transparency and accountability of decision-making processes.

UN (United Nations) / UNODC
(United Nations Office on Drugs and Crime)

The Conference of the States Parties (CoSP) to the United Nations Convention against Corruption (UNCAC) is one of the most important global forums for international anti-corruption cooperation, held biennially.

At the 11th session of the CoSP, the staff of the Integrity Authority's Integrity Academy (see point 1.11) presented within an international panel their professional achievements in youth research, particularly the main findings of the KORR-KÉP study concerning the younger generation's attitudes towards corruption and level of trust.

At the conference, the President of the Authority, Ferenc Pál Biró, presented the Authority's artificial intelligence-assisted risk analysis tools in the professional panel titled „AI and advanced analytics in financial investigations," as well as how technology-based solutions can contribute to identifying corruption risks and financial fraud. He pointed out that the Authority is developing a risk analysis system based on the most advanced AI-based technologies – with some of these developments being realised within a two-year digital project supported by the European Commission's Technical Support Instrument (TSI) and implemented with the professional contribution of the OECD (see point 2.1).

EPAC/EACN (European Partners against Corruption / European Contact-Point Network Against Corruption)

The EPAC/EACN is a European professional network that brings together anti-corruption authorities and police oversight bodies with the objective of promoting the reduction of corruption and strengthening cooperation through the exchange of experiences and the sharing of good practices. The EPAC brings together the anti-corruption bodies and law enforcement oversight institutions of the member states of the Council of Europe, while the EACN unites the anti-corruption authorities of the member states of the European Union. The two networks operate as a joint platform and facilitates professional dialogue through regular conferences and task forces.

On 25 and 26 February 2025, a delegation from the Authority visited Lithuania's anti-corruption authority (STT) as part of the BACPE (Best Practice Exchange Visit) project.

The Authority also participated in the EPAC/EACN annual conference and general meeting, held on 24 and 25 November 2025 at the Eurojust headquarters in The Hague, where the participants adopted "The Hague Declaration". Within the framework of the conference, the Authority gave a brief presentation on its innovative development based on artificial intelligence, which enables the natural language query of structured data and is one of the flagship projects of the Authority's data-driven approach.

Council of Europe

The staff of the Integrity Authority participated in the opening event of the Council of Europe's project against corruption and money laundering (Action against Corruption and Money Laundering in Europe) in Strasbourg on 25 and 26 November 2025. The objective of the action plan to be implemented between 2025 and 2032 is to grant customised technical assistance, share good practices, and develop effective anti-corruption frameworks in close cooperation with the participating authorities.

Within the framework of the event, the Authority was given the opportunity to present its institutional needs and its priorities in future cooperation, particularly in the areas of conflicts of interest, reporting systems, and national anti-corruption developments.

IAACA
(International Association of Anti-Corruption Bodies)

On 29 April 2025, the Authority's Head of Development and AI – together with representatives from the INTERPOL Innovation Centre – presented in an IAACA webinar how artificial intelligence and AI-based tools can be applied in the fight against corruption, with particular emphasis on data analysis and risk assessment. An important professional milestone for the Authority is that the IAACA Board approved its organisational membership in February 2025, and then in May 2026 – together with the Greek National Transparency Authority (NTA) and the Italian Autorità Nazionale Anticorruzione (ANAC) – it will host the network's first conference specifically focused on Europe in Budapest.

The delegation of the Integrity Authority participated in the IAACA annual conference and general assembly held in December 2025 in Doha, where the Authority's president, Ferenc Pál Biró, presented the organisation's developments in data analysis, machine learning, and the practical application of artificial intelligence. Ferenc Pál Biró will act as a member of the IAACA Executive Committee (ExCo) from 2025 to 2027, which clearly reflects the Authority's active and recognised role in international anti-corruption cooperation.

OECD (Organization for Economic Cooperation and Development)

The Authority continues to maintain ongoing professional relations with representatives of the OECD in order to enable OECD experts to participate in the preparation of the Authority's reports and analyses. The Integrity Authority, representing Hungary, once again participated in the spring and autumn meetings of the OECD Public Integrity and Anti-Corruption (PIAC) Working Group.

At the March meeting, Dániel Szügyi, the Authority's head of international relations, presented the Authority's digital solutions and innovative developments, while at the November meeting, Ferenc Pál Biró, President of the Authority, outlined the Authority's data-driven strategic approach and risk assessment tools, emphasising the importance of establishing data-based integrity frameworks.

OLAF (European Anti-Fraud Office)

OLAF is the European Union's anti-fraud office, responsible for protecting the Union's financial interests, which may conduct administrative investigations in all cases where fraud, corruption, or other infringement is suspected in relation to the use of European Union funds. The Authority's Head of Development and AI Máté Benyovszky presented the organisation's AI-based tools and its efforts to enhance analytical capabilities at OLAF's annual conference in Helsinki on 11 and 12 June 2025.

1.10 Events and conferences

The events organised by the Integrity Authority provide opportunities for representatives from the business, academic, civil, and public sectors to engage in collaborative thinking and exchange experiences on issues related to corruption and integrity, involving leading domestic and international experts.

Our international conferences serve to present trends and best practices, while smaller workshops and round-table discussions offer opportunities to jointly discuss dilemmas and share experiences.

Conference speakers are leading **domestic and international experts** from the public administration, higher education, research, and business sectors. Our events go beyond merely presenting the theoretical concept of corruption. Instead, they help participants realise that corruption risks and situations that may lead to abuses can affect anyone in their everyday lives.

The two-day **Converging Roads of Integrity 2025 conference,** organised last year by the Integrity Authority, is a good example of this approach. The event, attended by 300 participants, was opened by Piotr Serafin, Commissioner of the European Commission, and speakers included representatives from OLAF, the OECD, the FBI, and the International Anti-Corruption Academy (IACA), alongside the entire Hungarian anti-corruption ecosystem. In the same year, the Authority also brought one of the field's **international flagship events**, the 2025 annual conference of the European Network for Public Ethics (ENPE), to Budapest, integrating Hungary into the European mainstream of integrity-related standard-setting and knowledge transfer.



1.11 Integrity Academy

1.11.1 Educational activities and the shaping of social attitudes

The focus of the Integrity Academy's educational activities is on value-based knowledge transfer and the proactive shaping of social attitudes towards corruption. The Academy pursues a dual objective: it disseminates the Integrity Authority's accumulated expertise and experience while also providing a platform for collaborative thinking among public institutions, professional stakeholders, and society at large. The educational activities always focus on establishing consistency between thought and action. They strive not only to share theoretical knowledge but also to support participants attending the Academy's programmes in applying the values of integrity in their everyday decisions.

The activity of the Academy is based on three pillars:

- a cultural change aimed at the proper use of public funds,
- awareness-raising to facilitate the recognition of corruption,
- and shaping social attitudes to reduce tolerance.

The Academy places particular emphasis on cooperation with society at large, continuous communication and feedback, that is, the experience-based development of programmes, in which the Academy is supported by the Integrity Authority's work and practical experience. The Academy has established close professional and academic partnerships, and makes purposeful use of best practices and technological innovations.

In 2025, the Integrity Academy organised a total of **47 lectures and educational events**, attended by nearly 250 participants. The spring edition of the „Academy in the House" programme series, which serves the purpose of intra-institutional knowledge sharing, took place with 7 lectures and 72 participants, while the autumn edition saw approximately 35 staff members of the Integrity Authority attending each of the 6 lectures.

At the **University of Debrecen**, the course titled "Integrity in Management" was run during two academic semesters. In the spring, 20 students attended 9 lectures, and in the autumn, 25 students attended 11 lectures, learning the fundamentals of integrity-oriented management from the experts of the Integrity Authority. At the professional workshop day organised for the students of the Ludovika University of Public Service, the Integrity Authority's investigation work, research results, and the challenges of artificial intelligence were presented.

In addition to higher education and the public sector, the Academy also pays attention to engaging the youngest generation. The presentation delivered by Dr Petra Burai and Dr Kinga Vajda **at the invitation of the UNODC in Doha, at the COSP11** international anti-corruption conference demonstrated the growing professional and international integration of the Authority and the Academy. In an interactive class held for fourth-grade students, 26 primary school pupils had the opportunity to learn about issues of integrity and corruption. At the annual conference of the Hungarian Sociological Association, Dr Kinga Vajda delivered a presentation on young Hungarians' perceptions of and experiences with corruption.

The educational activities were complemented in 2025 by **11 publications**. Some of these present the results of the KORR-KÉP youth research in Hungarian and English,

including a DOI identifier, made available in recognised professional databases. For the information of the general public, the publication titled „10 Things You Didn't Know About Integrity and Corruption" was issued, of which approximately 2,000 printed copies reached readers.

The leaders and experts of the Authority gave numerous presentations at domestic and international professional forums and events, typically on topics related to public procurement and the use of artificial intelligence as an anti-corruption tool.

1.11.2 Research activity by the Integrity Academy

The objective of the Integrity Academy's research activities is to support the professional work of the Integrity Authority with robust data and analyses, as well as to curb corruption and promote evidence-based decision-making and integrity-focused public awareness-raising. The research projects focus on exploring the domestic characteristics of corruption and integrity, identifying possible intervention points, and producing knowledge that can be utilised in the assessment of the use of European Union funding, as well as in education, public awareness-raising, policy thinking and academia.

A notable highlight among the studies conducted in 2025 was the **KORR-KÉP youth research**, which used a random (probability) representative sample comprising more than a thousand participants to explore the perceptions of, experiences with and attitudes towards corruption and integrity among young Hungarians aged 15 to 29, while also assessing public perceptions regarding the efficiency of the use of EU funds, and reviewing domains closely related to corruption such as public trust in institutions. The research findings were published in 2025 across multiple channels and in various formats. Nine official publications related to the KORR-KÉP programme were released – including summaries, studies, as well as a brief professional summary in Hungarian and English.

In 2025, the **comprehensive research programme** entitled **"On the Right Path"** was also launched, during the first phase of which a large-sample, random (probability), representative corruption study was conducted covering the entire Hungarian population aged 18 and over. The research provides an opportunity for a comprehensive survey of social implications, including perceptions and direct experiences related to corruption, roles in the fight against corruption, institutional trust and access to various services, as well as efficiency in the use of European Union funds.

The research programme entitled "On the Right Path" will be supplemented with the results of 3 additional data collections in 2026. On the one hand, it will collect detailed data on corruption, integrity, anti-corruption efforts, and the use of EU funds from two specific target populations (two random sample questionnaire-based surveys examining Hungarian companies and enterprises, as well as civil servants). On the other hand, a study based on objective data capturing the anomalies of the Hungarian public procurement system through "proxy indicators" will also be prepared. The diverse data collection approaches and techniques thus implemented within the research programme provide a significantly broader, comprehensive overview to support the understanding of the phenomena under investigation.

Using the innovative methodology developed during the "On the Right Path" research programme, the results from various data collection phases and thus the responses from different target populations can be linked together, providing the opportunity for a holistic exploration of the phenomena of corruption and integrity and the effective substantiation of related measures.



Operations of the Integrity Authority

2.1. Establishing an operationally independent authority with its own infrastructure

Following from its autonomous legal status, the Integrity Authority attaches great importance to the establishment and continuous strengthening of an independent IT infrastructure that ensures complete organisational independence. Within this framework, the organisation carried out several interconnected IT projects, which marked a significant milestone in strengthening the technological foundations of the Authority's operations.

The separation from the uniform infrastructure service granted by NISZ Zrt. began in 2024 and was completed by the end of 2025. This means that the Authority's IT operations were placed within a framework independent of the Hungarian government sector.

In 2025, the core infrastructure was transitioned to a state-of-the-art technology environment designed for long-term sustainability. The infrastructure was established in a redundant data centre that fully complies with cybersecurity requirements and provides adequate technical and security conditions for the operation of the Authority. The Authority purchased both the equipment and the data centres through public procurement.

The investigation and document management systems supporting the main activity, the HR-supporting and Financial Management subsystems, as well as the back-end applications supporting digital transformation, operate on on-premises servers managed by the Authority in the data centres. This helps ensure compliance with data security standards while maintaining reliable operation.

From the second half of 2025, the Authority allocated significant resources to the development of digitalisation solutions and their system-wide implementation.

Thus, several workflow support solutions based on the document management system went live. The related activities will continue in 2026 in order for the Authority's operation to develop into a modern organisational model that effectively supports everyday work and widely digitises automatable processes.

2.2.1 Internal software developments supporting the Authority's core activities

In 2024, the development of systems supporting the Authority's professional functions began. This started with a survey of the available data sets and processes, followed by the planning of data uploads and the custom development of supporting software solutions.

Following market research, the software solutions available as products will be acquired and implemented through an open public procurement procedure. This includes, for example, the implementation of the digitalisation of internal investigation processes, which will become operational once the acquired system has been customised.

Software solutions based on artificial intelligence (AI), also considered innovative by the standards of our international survey, are designed and developed in-house, by our own team. An automated forecasting system and an LLM-supported (large language model) querying system designed to accelerate the analysis of investigative materials are also being developed. The system will be able to perform network analysis and run machine learning models based on complex rules and through automated processing, thereby enabling near real-time monitoring of EU-funded public procurement procedures from the time of their publication. The development of our AI-based interactive agent system, which can be interacted with using natural language and is able to query external systems, has the potential to make investigative work more effective.



2.2 Technical Support Instrument (TSI)

Since the beginning of its operations, the Integrity Authority has made participation in major, internationally recognised professional projects a priority, thereby enhancing its professional standing at both the national and international levels. As an important milestone in this endeavour, the Authority submitted a successful application under the 2025 call of the **Technical Support Instrument** (TSI) operated by the **European Commission Directorate-General for Structural Reform Support** (DG REFORM).

Under the winning application, the Authority receives EU funding of an **overall amount of EUR 600,000** for the implementation of a 24-month project carried out in professional cooperation with the **OECD**.

The TSI is a programme of the European Union that provides personalised professional advice to member states for planning and implementing their structural reforms. The objective of the newly launched project is **to enhance the Integrity Authority's analytical and data processing capacities, while introducing innovative, data-driven solutions to reduce irregularities and risks related to the use of EU funds.** At the heart of the initiative is the development of the Authority's digital strategy and action plan, which represent a major step towards a modern, data-driven operational model. The programme helps the Authority to perform its tasks even more efficiently in the prevention and early detection of individual and systemic irregularities related to the use of EU funds, as well as in mitigating fraud and corruption risks. The project facilitates the development and implementation of new methodologies in this filed, particularly in the identification and analysis of integrity risks in public procurement data.

The Authority held the public project launch event in the first phase of the project started in September 2025. The speakers of the official opening event included **Judit Rózsa**, Director for the TSI Programme within the European Commission's SG REFORM, **János Bertók**, Deputy Director of the OECD Public Governance Directorate, and **Ferenc Pál Biró**, President of the Integrity Authority. All of the speakers emphasised the project's professional importance and expressed their confidence in its future success.

The programme is currently in its second implementation phase, in which OECD experts held a series of consultations with several relevant Hungarian institutions – including the State Audit Office, the Hungarian Competition Authority, the National Development Centre, the Public Procurement Authority, and the Directorate General for Audit of European Funds – between 14-16 October 2025 and 19-22 January 2026. The objective of the meetings was to provide the participating institutions with a detailed understanding of the project's objectives and professional directions, while jointly identifying the methodologies, databases, and points of data integration through which inter-institutional cooperation and data sharing can be strengthened in the future.

The **lack of data access** remains a critical obstacle to the successful implementation of the project. The consultations also provide an opportunity to strengthen long-term inter-institutional cooperation and may facilitate the Authority's future access to data sources essential to the performance of its functions. Therefore, the project not only involves an expansion of technical capacity, but also fosters institutionalised cooperation across administrative institutions.

2.3 Financial management and the utilisation of budget appropriations in 2025

2.3.1 Introduction

This chapter reviews the Integrity Authority's budgetary management in 2025 based on the closing general ledger data. The analysis focuses on comparing the approved appropriations (closing debit balance of Appropriation accounts) and the actual financial transactions (closing debit balance of Operating accounts), with particular emphasis on the efficiency of current and capital expenditures.

2.3.2 Aggregated financial indicators

The Authority's total expenditure appropriation amounted to HUF 34.44 billion, of which HUF 21.08 billion was financially executed, representing an overall execution rate of 61.2%. The stability of the Authority's financial management and the coverage of expenditures were ensured by the 100% utilisation of the previous year's unspent balance (HUF 15.13 billion), as well as the funding provided by the central governing body (HUF 19.3 billion).

The Authority's actual **total expenditure** for 2025 was **HUF 6,161,258,210**, which resulted in **HUF 13,141,180,279 being repaid** to the Central Residue Settlement Fund as an unspent balance.

Of the 2025 budget appropriation, **31.93%** was utilised.

2.3.3. Detailed expenditure analysis

Staff costs and related social security contributions (051, 052)

The total budget appropriation for personnel-related expenses (wages and contributions) amounted to HUF 5.2 billion, of which HUF 3.22 billion was paid (61.9%).

- **Staff costs:** Of the HUF 4.54 billion budget appropriation, 62.3% was utilised. Savings of nearly HUF 1.71 billion were attributable to the gradual filling of staff positions and the time-proportionate utilisation of salary appropriations.
- **Social security contributions:** In line with salary payments, social security contributions were executed at 59.5%, leaving an unutilised balance of HUF 268 million.

Operating expenditures (053)

The utilisation rate of the operating expenditure appropriation (HUF 3.79 billion) was 50.5%. There are significant differences in this area:

- **Rental and leasing costs:** The outstanding execution rate of 92% (HUF 397 million) reflects the timely fulfilment of fixed contractual obligations.
- **Communication services:** An execution rate of 63.5% (HUF 440 million), reflecting the maintenance needs of digital operations.
- **Professional support services:** The Authority used 18.8% of the allocated overall amount of HUF 1 billion, HUF 183 million, as it performed a significant part of

the professional functions in this category internally.
- **Business travels:** 42.5% of the HUF 92 million budget was utilised, indicating a lower than expected volume of official travel.

Other expenses for operational purposes (055) – (repayment of balance)
This group of budget items (HUF 14.93 billion) was utilised almost entirely, with a 99.9% accuracy. This is a key item, accounting for more than 70% of the total expenditure of the Authority.

Capital investments and capital expenditures (056)
The indicators of investment activity are the lowest in the budget (an average utilisation of 9.8%):
- **Properties:** The utilisation of the HUF 6 billion budget allocation is 0%, with no payment made.
- **IT equipment:** 30.9% (HUF 310 million) of the HUF 1 billion appropriation was utilised.
- **Immaterial assets (software solutions):** 24.8% of the HUF 875 million budget allocation was utilised.

2.3.4. Conclusions

The Authority's financial management in 2025 was characterised by secure liquidity and a significant unutilised appropriation balance. While the operating conditions (rental, communication, base salaries) were guaranteed, a significant portion of strategic developments and high-value investments (real estate, IT infrastructure, professional consultancy) fell short of the planned level.

The nearly HUF 13.36 billion unutilised expenditure allocation provides an opportunity to finance developments in the next period, while also highlighting the need to accelerate investment processes and the procurement of professional services.

2.3.5 K1–K2: Staff costs and related social security contributions – 2026 Plan

The 2026 budget plan is based on a stable headcount of 150 in terms of personnel expenses (K1) and employer contributions (K2). Personnel expenses include regular salaries, allowances, other personnel expenses, and specified external personnel payments (e.g. contractual fees, representation expenses). Contributions include the mandatory payroll-related contributions, primarily the social contribution tax and other statutory employer charges.

The objective of the planning is to ensure that the human resources enabling the Authority to perform its core tasks have a long-term sustainable and predictable funding base. The level of personnel and contribution expenditures allows for the retention of the existing headcount, the maintenance of the organisation's professional stability, as well as the competitive remuneration of job roles that provide key competencies. The budget appropriation was designed to allow flexibility for mid-year adjustments in response to potential internal or central wage measures.

Overall, lines K1–K2 in the 2026 budget represent the "personnel backbone" of the Authority's operation: the priority is to retain the expertise necessary for the performance of functions and to maintain employees' income security, while the budget planning process prudently accounts for external wage pressures arising from regulatory and macroeconomic factors.

2.3.6 K3–K6: Operating and capital expenditures – plan for 2026

The structure of the 2026 operating (K3) and capital/investment (K6) expenditure plan was designed to ensure the security of day-to-day operations, while also supporting longer-term development objectives. Within the K3 budget line, operating items (rental fees, maintenance, utilities and telecommunications costs) as well as expenditure items supporting professional activities (IT services, expert and consultancy fees, research projects) are of key importance. These ensure that the Authority performs its functions with a modern IT and telecommunications background, in a secure operational environment.

The K6 budget line, i.e. the investment expenditure appropriation, primarily focuses on the development of IT infrastructure, security systems and specialised IT systems. The objective of the planned capital expenditures is to address the risks associated with deferred investments from previous years and to improve the infrastructure supporting digital operations, data security, and long-term efficiency. This includes software licence extensions, new or replacement hardware, as well as investment-type projects that enhance the Authority's control, analytical, and monitoring capabilities.

Overall, the K3–K6 expenditure allocations serve to ensure that, in addition to personnel capacities, the material, infrastructural, and technological foundations supporting the Authority's operations also continue to develop in a balanced manner. Operating expenditures ensure continuous, uninterrupted operation, while investments contribute beyond the year 2026 to the qualitative improvement of the Authority's performance of its functions and the organisation's digital renewal.

2.4 The Functioning of the Integrity Authority from an ESG Perspective

Although its core tasks are mainly related to the performance of public duties, it can be observed in the organisation's operation that it also carries out conscious developments in the environmental, social, and governance dimensions.

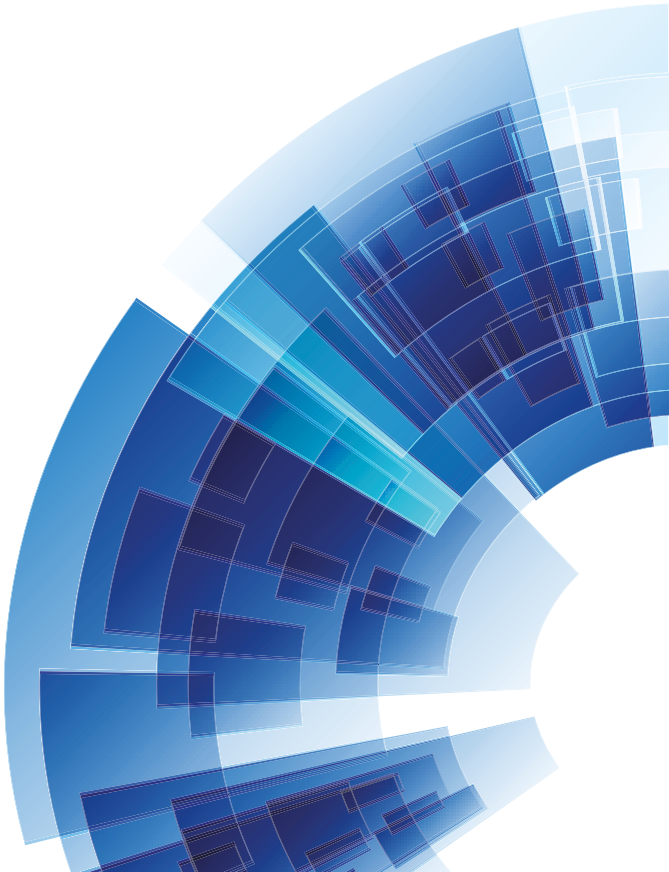
From an environmental perspective, the Authority has taken numerous steps to reduce its ecological footprint. The organisation's vehicle fleet has undergone significant transformation in a short period, with the proportion of electric vehicles exceeding the statutory requirements stipulated in Government Decree No

397/2022 of 20 October 2022 (X. 20.), governing the domestic implementation of the EU Clean Vehicles Directive (Directive (EU) 2019/1161), thereby fostering the uptake of lower-emission transport solutions.
In order to mitigate environmental impacts, the Authority offers the possibility of selective waste collection and has also implemented digitalisation developments. An electronic administration system was introduced to replace paper-based administration processes, supplemented with electronic signature capabilities and a record-keeping system supporting HR processes. In a comprehensive digitalisation project, the Authority also launched the modernisation of its onboarding and employment administration. These measures not only contribute to reducing paper consumption but also enable faster, more transparent, and more efficient administration.

The environmental impact of digital operations can also be assessed based on the carbon footprint analysis on the organisation's website. According to the measurement performed in December 2025, the homepage of the Integrity Authority operates with an emission of 0.53 g CO_2e per page load, and in addition, some of the organisation's digital interfaces already provide optimal environmental performance.

Regarding the social dimension, even the performance of the Authority's core tasks alone have a significant social impact through its contribution to the fight against corruption. The balanced gender distribution among employees (68-73), an existing Code of Ethics, and the complaint handling mechanism are key to fostering the development of a diverse and inclusive organisational culture. In addition, a voluntary task force has been established within the organisation to enable the Authority's staff to participate in community charitable activities. Under the initiative, employees are invited to prepare sandwiches for homeless shelters, participate in clothing donation campaigns for those in need, join meal distribution programmes and Christmas charity collections, and make donations to animal shelters.

Concerning the Governance pillar, the Authority places particular emphasis on employee well-being and organisational transparency, therefore it regularly conducts anonymous surveys to identify employees' needs and collect their feedback. The employee benefits system has been expanded with numerous elements and become more flexible. The strengthening of organisational culture is also served by the regular introduction of new staff and the implementation of the Employee Referral Programme.



List of abbreviations

AI – artificial intelligence

Authority – Integrity Authority

BACPE – Best Anti-Corruption Practice Exchange

CoSP – Conference of the States Parties to the United Nations Convention against Corruption

DGAEF – Directorate General for Audit of European Funds

DGAEF Act (Eutaftv.) – Act XLIV of 2022 on the Directorate-General for Audit of European Funds and Amending Certain Acts Adopted at the Request of the European Commission to Ensure the Successful Conclusion of the Conditionality Procedure

DIAI – Directorate of Internal Audit and Integrity

ENPE – European Network for Public Ethics (a professional network of independent authorities from EU member states dealing with public integrity)

EPAC/EACN – European Partners against Corruption / European Contact-Point Network against Corruption

FBI – Federal Bureau of Investigation

General Administrative Procedure Act (Ákr.) – Act CL of 2016 on the Code of General Administrative Procedure

Government Administration Act (Kit.) – Act CXXV of 2018 on Government Administration

HCA – Hungarian Competition Authority

IAACA – International Association of Anti-Corruption Authorities

IACA – International Anti-Corruption Academy

ICAC – Independent Commission Against Corruption

Integrity Authority Act (Eufetv.) – Act XXVII of 2022 on the Control of the Use of European Union Budget Funds

NISZ Zrt. – National Infocommunications Services Company Ltd.

OECD – Organisation for Economic Co-operation and Development

OLAF – European Anti-Fraud Office

Records Act (Nytv.) – Act LXVI of 1992 on Keeping Records on the Personal Data and Address of citizens

STT – Special Investigation Service of the Republic of Lithuania

TSI – Technical Support Instrument

UNCAC – United Nations Convention against Corruption

UNODC – United Nations Office on Drugs and Crime

INTEGRITY AUTHORITY

We are building an independent, professionally credible, and internationally recognized authority that is instrumental in strengthening public trust and serves as a model of integrity and ethical conduct.

Budapest
2026


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AUTHORITY

INTEGRITY AUTHORITY

H-1051 Budapest,
Széchenyi István tér 7-8.

www.integritashatosag.hu