

Adoption: 27 March 2026
Publication : 14 October 2026

Public
GrecoRC4(2026)3

FOURTH EVALUATION ROUND

Corruption prevention in respect of members of
parliament, judges and prosecutors

ADDENDUM TO THE SECOND COMPLIANCE REPORT HUNGARY

Adopted by GRECO at its 102nd Plenary Meeting
(Strasbourg, 23-27 March 2026)

F
O
U
R
T
H

E
V
A
L
U
A
T
I
O
N

R
O
U
N
D

I. INTRODUCTION

1. The [Fourth Round Evaluation Report on Hungary](#) was adopted by GRECO at its 67th Plenary Meeting (27 March 2015) and made public on 22 July 2015, following Hungary's authorisation. GRECO's Fourth Evaluation Round deals with "Corruption Prevention in respect of Members of Parliament, Judges and Prosecutors".
2. In the [Compliance Report](#), adopted by GRECO at its 76th Plenary Meeting (23 June 2017) and made public on 1st August 2019, it was concluded that Hungary had implemented satisfactorily or dealt with in a satisfactory manner only five of the 18 recommendations contained in the Fourth Round Evaluation Report (recommendations vii, ix, xi, xiii and xviii). In the light of these results, GRECO concluded that the overall low level of compliance with the recommendations was "globally unsatisfactory" within the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure. It therefore decided to apply Rule 32, paragraph 2 (i) in respect of members not in compliance with the recommendations contained in the mutual evaluation report and called on the Head of the Hungarian delegation to submit a report on progress in implementing the outstanding recommendations.
3. In the [Interim Compliance Report](#), adopted by GRECO at its 81st Plenary Meeting (7 December 2018) and made public on 1st August 2019, it was concluded that Hungary had still only implemented satisfactorily or dealt with in a satisfactory manner five of the 18 recommendations contained in the Fourth Round Evaluation Report. In the light of these results, GRECO concluded that the overall low level of compliance with the recommendations remained "globally unsatisfactory" within the meaning of Rule 31, paragraph 8.3 of its Rules of Procedure. In accordance with Rule 32, paragraph 2 (ii), GRECO instructed its President to send a letter – with a copy to the President of the Statutory Committee – to the Head of Delegation of Hungary, drawing his attention to the need to take determined action with a view to achieving tangible progress as soon as possible.
4. In addition, given the lack of information provided and the lack of progress in implementing the recommendations, in accordance with Rule 32, paragraph 2 (iii), GRECO also requested the authorities of Hungary to receive a high-level mission in order to discuss, on the spot with all stakeholders concerned, ways to expedite the legislative and policy changes highlighted in the *Interim Compliance Report*. This high-level mission took place on 1st March 2019, at which the GRECO delegation¹ met with the State Secretary for Cooperation in European and International Justice Affairs at the Ministry of Justice, the Prosecutor General and the President of the National Judicial Council, as well as representatives of the National Office for the Judiciary and members of the Hungarian Delegation to the Parliamentary Assembly to the Council of Europe.
5. The [Second Interim Compliance Report](#) was adopted at GRECO's 85th Plenary Meeting (25 September 2020) and made public on 17 November 2020. It concluded that Hungary had still only implemented satisfactorily or dealt with in a satisfactory manner five of the 18 recommendations contained in the Fourth Round Evaluation Report. Four recommendations had been partly implemented and nine not implemented. The level of compliance was again assessed as "globally unsatisfactory". GRECO invited the President of the Statutory Committee to send a letter to the Permanent Representative of Hungary to the Council of Europe, drawing the attention to non-compliance with the relevant recommendations.

¹ The GRECO delegation comprised the President of GRECO, the Council of Europe Director of Information Society and Action Against Crime, the Head of the Austrian Delegation to GRECO, GRECO's Executive Secretary and a member of the GRECO Secretariat.

6. The [Third Interim Compliance Report](#) was adopted at GRECO's 89th Plenary Meeting (3 December 2021) and made public on 8 September 2022. It concluded that Hungary had implemented satisfactorily or dealt with in a satisfactory manner six of the 18 recommendations contained in the Fourth Round Evaluation Report. Three recommendations had been partly implemented and nine not implemented. The level of compliance was again assessed as "globally unsatisfactory".
7. The [Fourth Interim Compliance Report](#) was adopted at GRECO's 93rd Plenary Meeting (24 March 2023) and made public on 9 June 2023. It concluded that Hungary had implemented satisfactorily or dealt with in a satisfactory manner six of the 18 recommendations contained in the Fourth Round Evaluation Report. Six recommendations had been partly implemented and six not implemented. GRECO concluded that the level of compliance was no longer "globally unsatisfactory" in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure. GRECO therefore decided not to continue applying Rule 32 concerning members found not to be in compliance with the recommendations contained in the Evaluation Report.
8. The Second Compliance Report was adopted by GRECO at its 98th Plenary Meeting (22 November 2024). Its publication has not yet been authorised by the authorities of Hungary. Pursuant to Rule 31 revised, paragraph 9, of its Rules of Procedure, GRECO asked the head of the Hungarian delegation to provide a report on the measures taken to implement the outstanding recommendations (i.e. recommendations i-iii, vi, xii, xiv, xvi and xvii). That report, submitted on 4 December 2025, as well as additional information provided subsequently, forms the basis of this report.
9. This [Addendum to the Second Compliance Report](#) assesses the further implementation of the eight outstanding recommendations and performs an overall appraisal of Hungary's level of compliance with these recommendations.
10. GRECO selected Austria (with respect to members of parliament) and Romania (with respect to judges and prosecutors) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Ms Brigitte ROM on behalf of Austria and Mr Sorin TANASE on behalf of Romania. They were assisted by GRECO's Secretariat in drawing up this Report.

II. ANALYSIS

11. GRECO addressed 18 recommendations to Hungary in its Fourth Round Evaluation Report. In the Second Compliance Report, GRECO concluded that 10 recommendations (iv, v, vii, viii, ix, x, xi, xiii, xv and xviii) had been implemented satisfactorily or dealt with in a satisfactory manner, four recommendations (i, vi, xiv and xvii) had been partly implemented and four recommendations (ii, iii, xii and xvi) had been not implemented. Compliance with the outstanding recommendations is dealt with below.

Corruption prevention in respect of members of parliament

Recommendation i

12. *GRECO recommended (i) to ensure that all legislative proposals are processed with an adequate level of transparency and consultation and, (ii) that rules be introduced for members of parliament on how to interact with lobbyists and other third parties seeking to influence the parliamentary process.*
13. [GRECO recalls](#) that this recommendation was partly implemented in the Second Compliance Report. For the first part, GRECO welcomed that 92% of the legislative

texts were subject to public consultation. However, it also noted that important legislative texts tended not to be subject to public consultation. Regarding the second part of the recommendation, GRECO noted that no progress had been made.

14. The authorities indicate that, pursuant to Section 5/B of Act CXXXI of 2010 on social participation in the preparation of legislation (hereinafter: the Act), the Directorate General for Audit of European Funds (DGAEF) certifies every year whether the objective of Section 5/A (3) point a) of the Act has been achieved, *i.e.* whether 90% of the laws, government decrees and ministerial orders promulgated in the period under review have been subject to public consultation pursuant to Section 5/A (1) point a) of the Act. During the period under review, a total of 1,093 laws, government decrees, and ministerial decrees were published in the Hungarian Gazette. 118 pieces of legislation do not fall within the scope of the Act, and in the case of 3 pieces of legislation, it was established that consultation with government bodies had begun prior to the period under review. The DGAEF conducted the certification procedure for 975 pieces of legislation, of which 933 were promulgated after public consultation, corresponding to 96% of the legislation subject to review. 42 pieces of legislation were not subject to public consultation, corresponding to 4% of the legislation reviewed.
15. GRECO takes note of the information provided by the authorities. It appears that 96% of the legislation is promulgated after public consultation, which is positive. However, concerns have been raised about the fact that certain important legislative amendments are not subject to public consultation procedures because they are introduced directly by individual MPs or parliamentary committees at a very late stage of the legislative process.² There have been no new developments reported regarding the second part of the recommendation, namely the introduction of rules for MPs on how to interact with lobbyists.
16. Consequently, GRECO concludes that recommendation i remains partly implemented.

Recommendation ii

17. *GRECO recommended that a code of ethics/conduct for members of parliament be adopted, including in respect of their staff as appropriate – covering various situations of conflicts of interest (gifts and other advantages, third party contacts, lobbyists, accessory activities, post-employment situations, etc.) and that it be complemented by practical measures for its implementation, such as dedicated training and counselling.*
18. GRECO recalls that this recommendation was not implemented in the Second Compliance Report. GRECO welcomed that codes of ethics for MPs and Parliament Office employees were planned and that training on integrity awareness, taking into account the content of the future codes of ethics, was also planned. However, these measures had not yet materialised in practice.
19. The authorities now report that a Code of Ethics and Conduct, prepared by the Office of the National Assembly, has been published on the Office's intranet network. The Director General's Regulation on the Code of Ethics and Conduct of the Office of the National Assembly was signed by the Speaker of the National Assembly on 9 October 2024 and entered into force on 10 October 2024. Its separate appendix contains the

² European Commission, 2025 Rule of Law Report - Country Chapter [Hungary](#), 8 July 2025, pp. 23-24 ("Examples include amendments to the Fundamental Law or legislation with impact on fundamental rights and EU law. The Government has continued its practice to include only technical amendments in draft laws and then introduce new and substantive amendments in the bill at a very late stage in the legislative process, through the Committee on Legislation, just before the final vote in Parliament. In this way, a regular parliamentary debate and public consultation are avoided.").

ethical principles and rules of conduct applicable to civil servants and employees of the National Assembly. With regard to protocol gifts for domestic state leaders, the Government Decree 477/2024 (XII. 31.) on the procedure to be followed in relation to protocol gifts³ entered into force on 1st January 2025. The Speaker of the National Assembly, in his Regulation No. 6/2022 on matters relating to gifts received on behalf of the National Assembly, made it mandatory for persons and delegations acting on behalf of the National Assembly to report gifts (other than promotional gifts) received at related events. In addition, training materials and a knowledge assessment questionnaire have been developed for integrity awareness training for civil servants at the Office of the National Assembly, taking into account the content of the new Code of Ethics and Conduct. The necessary IT development for the training has been completed, and the materials and other resources are now available to everyone, including MPs, on the internal office network.

20. GRECO notes that the Office of the National Assembly has prepared a Code of Ethics and Conduct. However, it observes that the Code applies to employees of the Office of the National Assembly only, not to MPs. Training and counselling for MPs also need to be developed, as only training for civil servants is available thus far. Therefore, the recommendation cannot be considered implemented, even partly.
21. GRECO concludes that recommendation ii remains not implemented.

Recommendation iii and vi
22. *GRECO recommended that:*
 - *a requirement of ad hoc disclosure be introduced for members of parliament for situations of personal conflicts of interest which may emerge during the parliamentary proceedings and that rules for such situations be developed (recommendation iii);*
 - *appropriate measures be taken to ensure effective supervision and enforcement of the existing and yet to be established rules on the conduct, conflicts of interest and interest declarations of members of parliament and that adequate and proportionate sanctions be introduced to that end (recommendation vi).*
23. GRECO recalls that recommendation iii remained not implemented and recommendation vi remained partly implemented in the previous compliance report, as the authorities had reported no progress.
24. The authorities provide no new information regarding recommendations iii and vi.
25. In the absence of any new development, GRECO concludes that recommendation iii remains not implemented and recommendation vi remains partly implemented.

Corruption prevention in respect of judges

Recommendation xii

26. *GRECO recommended that the immunity of ordinary judges be limited to activities relating to their participation in the administration of justice ("functional immunity").*
27. It is recalled that this recommendation remained not implemented in the Second Compliance Report, as no new measures had been reported.

³ <https://net.jogtar.hu/jogszabaly?docid=a2400477.kor>.

28. The authorities provide no new information regarding this recommendation.
29. In the absence of any tangible progress regarding the implementation of this recommendation, GRECO concludes that recommendation xii remains not implemented.

Corruption prevention in respect of prosecutors

Recommendation xiv, xvi and xvii

30. *GRECO recommended that:*
- *i) the possibility to re-elect the Prosecutor General be re-considered and ii) the possibility to maintain the Prosecutor General in office after the expiry of his/her mandate by a minority blocking of the election in Parliament of a successor be reviewed by the Hungarian authorities (recommendation xiv);*
 - *the immunity of public prosecutors be limited to activities relating to their participation in the administration of justice ("functional immunity") (recommendation xvi);*
 - *disciplinary proceedings in respect of prosecutors be handled outside the immediate hierarchical structure of the Prosecution Service and in a way that provides for enhanced accountability and transparency (recommendation xvii).*
31. GRECO recalls that recommendations xiv and xvii remained partly implemented and that recommendation xvi remained not implemented in the Second Compliance Report, as no progress had been made.
32. The authorities provide no new information regarding recommendations xiv, xvi and xvii.
33. In the absence of any new development, GRECO concludes that recommendations xiv and xvii remain partly implemented and that recommendation xvi remains not implemented.

III. CONCLUSIONS

34. In view of the foregoing, GRECO concludes that Hungary has implemented satisfactorily or dealt with in a satisfactory manner 10 of the 18 recommendations contained in the Fourth Round Evaluation Report. Of the remaining recommendations, four have been partly implemented and four remain not implemented.
35. More specifically, recommendations iv, v, vii to xi, xiii, xv, and xviii have been implemented satisfactorily or dealt with in a satisfactory manner. Recommendations i, vi, xiv and xvii have been partly implemented and recommendations ii, iii, xii and xvi have not been implemented.
36. In respect of members of parliament, the most prominent outstanding issues include enhancing the transparency of the legislative process and introducing measures to promote and ensure integrity among MPs, including training and counselling. Rules on MPs' interactions with lobbyists, as well as on the *ad hoc* disclosure of potential conflicts of interest between their parliamentary work and private interests, should still be introduced. Effective supervision and enforcement of rules of conduct, conflicts of interest and asset declarations must also be ensured.

37. As regards judges, one recommendation remains not implemented. The issue of the far-reaching immunity of judges therefore remains a concern.
38. As regards prosecutors, GRECO regrets that no new information was provided as regards the implementation of the three remaining recommendations, namely the handling of disciplinary proceedings outside the direct hierarchical structure, the prolongation of the term of the Prosecutor General and the broad immunity enjoyed by prosecutors. The authorities are urged to take action on all these important issues.
39. In view of the fact that eight out of 18 recommendations are yet to be implemented, GRECO, in accordance with Rule 31 revised, paragraph 9, of its Rules of Procedure, asks the Head of the delegation of Hungary to submit additional information, namely regarding the implementation of recommendations i, ii, iii, vi, xii, xiv, xvi and xvii by 31 March 2027.
40. GRECO invites the authorities of Hungary to authorise, as soon as possible, the publication of the present report, to translate it into the national language and to make this translation public.
41. GRECO also calls upon the authorities of Hungary to authorise, without further delay, the publication of the Second Compliance Report, adopted by GRECO at its 98th plenary meeting (22 November 2024).