How corrupt is this country? What type of corruption? How did it evolve during the years? Was there a period when it was more corrupted and what happened to change that? What were the civil society responses? Did the political context allow for more anticorruption measures to be enforced? This report answers all these questions and more.
COUNTRY

How corrupt is this country? What type of corruption? How did it evolve during the years? Was there a period when it was more corrupted and what happened to change that?

Hungary with its almost 100 thousand square kilometers and 10 million citizens is a medium-size country in Central and Eastern Europe. It joined the NATO in 1999 and then the EU in May 2004. The EU accession process resulted in the elaboration of an anti-corruption legal framework, which would match the European standards. The post-accession period is characterized by a somewhat slower development of the legal regulations. By and large, though, Hungary has well developed legal regulations concerning corruption, nonetheless, diverse reports and evaluations indicate that investigation and enforcement are lacking (TI 2009). It is estimated that the black economy of the country is large and amounts to 15-18% of official GDP (Elek et al 2009), which also to a degree reflects the size of corruption (TI GCR 2009: 345; TI NIS 2008: 13). Moreover, WB’s Doing Business study estimates that administrative burden on companies is also high and falls in the range 4.5-6.7% of GDP. This looks a lot when set against 3.5% of GDP in the EU25 (TI GCR 2009: 344-5). Finally, a perception survey points out the fact that corruption in the country is definitely growing in the last 5-10 years (Szántó and Tóth 2008: 88) and the businesspeople estimate that the corruption fees constitute between 3-25% of a given transaction (TI GCR 2009: 344). Of course corruption is differentiated across sectors, with the most corrupted being the health care system, construction, and police as well as across state activities where public procurement is the most infected. In the latter, it is suggested that corruption fees on average amount to 22-26% of the procurement contract value involving 70-90% of all public procurement procedures (Közbeszerzési Tanács 2009). One striking point is that there is no single body created for investigation and prosecution of corruption (TI NIS 2007: 11).

Two basic kinds of corrupt activities may be distinguished in Hungary. One being an illegal behavior in a private sector and another being corruption at the intersection of the private and public spheres. Another important division goes along the subsistence/self-interest lines. Many enterprises, especially SMEs, engage in the
so-called ‘subsistence’ corruption, that is illegal activities that allow them retaining a greater part of their profit in a company (instead of paying it to state) and thanks to that the survival of a firm is possible (TI GCR 2009: 347). In other words a company may either avoid paying taxes, or they pay parts of salaries under the table, engage in non-registered employment or provide services without invoices etc (TI NIS 2008: 13). The phenomenon of subsistence corruption is widely spread, partly because of high taxes and administrative burden, complicated and constantly changing tax system and legal regulations. In fact Hungary has one of the highest levels of labor taxation in the region (TI NIS 2008: 13). Self-interested corruption simply aims at achieving material or non-material gains in the exchange for a ‘right’ contract decision, information etc, which in a non-transparent environment is relatively easy and tempting.

Although corruption is on the rise in Hungary, it is getting increasingly difficult to track down and prove, because simple bilateral corrupt relationships have been evolving in the direction of more elaborated and institutionalized ones. In contemporary illegal activities various ‘middlemen’ or third parties cooperate with each other e.g. subcontracting companies, foundations (even local police foundations! (Tóth and Fazekas, 2009)), foreign account holders etc, and they form chains of relationships that cloak the money flow and blur interests connections between entities (Szántó and Tóth 2008: 87). Additionally, also SMEs are becoming more skillful in the area of corrupt activities, which makes the work of anti-corruption agencies even more difficult, since the latter do not possess enough resources to check such a big number of enterprises.¹ On top of that, the businesspeople claim that enterprises restraining from corruption are competitively disadvantaged in comparison to firms engaged in corruption (Fazekas, 2009a, TI NIS 2008: 10). Finally, the State Audit Office (SAO) carries out usually only legality audits, although it is also entitled by law to investigate into expediency and effectiveness issues. Thus the simplest form audit is carried out only which may lead to overlooking abuses (IT NIS 2007: 36).

Private sector. Hungary is a small and open economy, which is strongly dependent on external markets, which is especially well demonstrated during the current financial crisis. Because of the small economy size and a high degree of state

¹ Most important audit institutions/agencies are: State Audit Office (SAO), Competition Office (GVH) and the State Financial Supervisory Authority (PSZÁF).
participation in the market (some 50% of GDP constitute state expenses) competition is weak and Hungarian companies to a great extent rely on public subsidies and contracts to maintain their activities. In Hungary 99% of companies are SMEs, many of which are single person enterprises (67%). Many of them rely on contracts from one client (a company or government), which makes their existence insecure and dependent, hence many SMEs are vulnerable to pressure from their source of income, which might result in the 'subsistence' corruption (TI NIS 2008: 12-14).

In general, corruption in business to business contacts happens to a lesser extent than in business to government relations. Already mentioned subsistence corruption results from too high taxes and unclear and complicated procedures (TI NIS 2008: 14). On a greater scale corruption in the private sector takes the form of cartels which divide up the market and set prices favorable for cartel members. Cartels are difficult to uncover, yet, recently (June 2008) there was a new regulation enforced that ensures immunity to a whistleblowing company, which informs police about a cartel agreement. This is one of a very few regulations regarding whistleblowers in Hungary, and diverse reports points out that this area should be developed in Hungarian legislation if fight against corruption is to be more effective (TI 2009: 31; TI GCR 2009: 343; TI NIS 2007: 30, 43, 48).

**Private-Public Intersection.** The intersection of private-public spheres is much more corruption prone than the business to business relations (TI NIS 2008: 18). Especially the area of public procurement is tempting for illegal activities because the state is so heavily engaged in the economy. Additionally, regulations are very complex and contain many loopholes. Moreover, public officials are not well remunerated and to make things worse there is a rule of collegial decision taking in the area of public tenders instead of personally signed decisions. In this system, when a court decides that a public body’s decision infringed the law, then a fine is paid from public money and no individual responsibility is borne (TI GCR 2009: 346).

Private-public corruption thrives at both national and local levels. In fact, money spent at the central level are more transparent, especially government spending backed by the EU transfers. At the local plane though resources are far less visible and ties between business and politicians/public officials are much closer. This results in more opportunities for illicit agreements (Szántó and Tóth 2008 : 87; TI NIS 2008: 19-20).
It is estimated that corruption adds 20-25% to the costs of public procurement, and resulting tenders do not deliver the best products/services (TI NIS 2008: 24).\(^2\) Already in 2001 the procurement law was criticized for being opaque and paving the way to abuses (TI GCR 2001: 128). The Public Procurement Act was written anew in 2004, however, in an overly complicated and detailed fashion, which makes it obscure and hard to apply. Although this act fulfills the criteria of acquis communautaire, its continuous evolution, i.e. it has been amended five times every year since its creation, adds only to a regulatory confusion. Such a lack of transparency creates favorable conditions for corruption, which indeed is often utilized.

Companies operating in Hungary are well aware of corruption taking place during tenders, nevertheless, they seldom notify about this illegal behavior. That is due to two main reasons. Firstly, they avoid earning a patch of a troublemaker and which would jeopardize winning of possible future contracts. It seems more rational for companies to keep silent and be more pro-active in other tenders. Secondly, the court system in Hungary is very slow and challenging tender decisions takes 3 to 5 years to accomplish, which simply does not pay off (TI NIS 2007: 58; TI NIS 2008: 23, 29).

**CIVIL SOCIETY**

*How strong is civil society in this country? What is its reputation? Are notable anticorruption projects known without any research? Are notable anticorruption heroes? What are they (prosecutors, activists, journalists, etc) Who are they (we may want to interview them).*

Civil society in Hungary is relatively weak by Western European and moderate by Central Eastern European standards, the most developed being environmental protection which already played an important role in Hungarian transition. It suffers from the same weaknesses as in many countries of the region: the lack of broad membership base and funding limitations (Rose-Ackerman 2005). At the turn of the century 75% of Hungarians belonged to no civil society group (CSO) and 86% did no voluntary work (Rose-Ackerman, 2005). Civil society organizations (CSOs) stood in a difficult financial position as on average some 45% of their expenses are funded from the state budget, next 30% comes from international donors, 5-10% from own

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\(^2\) Note that this figure largely intersects with the Közbeszerzési Tanács (2009) figure.
activities and the rest from individuals and businesses (TI NIS 2007: 80). Such a heavy reliance on public money may influence CSOs’ willingness to touch on anti-corruption issues, because e.g. all major political parties are widely known to accept money for political campaigns via not exactly transparent ways.

The government announced the Civil Society Strategy in 2002, which later was modified in 2006. This document prescribes cooperation between decision makers and CSOs in the framework of social consultations. Thanks to these regulations CSOs gained influence, especially at the local level, on drafting regulations and the decision-making process. An important element of the state financing for NGOs are the system of 1% personal income tax donations and the National Civil Fund. Since 1997, citizens declaring their personal income tax are free to donate 1% of their total payable personal income tax to CSOs (1996. CXXVI. Law). This creates a sort of marketplace for ideas and resulting decentralized funding mechanism. Moreover, the National Civil Fund matches 1% income tax donations made by citizens with state budget allocations and distributes them on a project basis to CSOs (FH NIT 2008: 6). In spite of the extensive involvement of civil society actors in the decision making of the Fund it is said to be paternalistic and non-meritocratic.

This dependence on state financing may lead to the political capture of some NGOs and indeed international think tanks warn that NGOs and CSOs may be utilized to gain political power and recognition (TI NIS 2007: 80). Another factor that undermines CSOs’ position is that they themselves often engage in illegal practices in order to obtain more money, thus they evade taxes, break not-for-profit rules, or claim higher tax returns (TI NIS 2007: 79).

There are some anti-corruption projects which are known by a wider public, nevertheless, even these are far from being universally recognized. Also, there are no national anti-corruption heroes. This is true even if the Hungarian media particularly frequently discusses corruption issues so it seems that the problem is high on the public’s agenda (Cserpes et al 2008).

Among the more known anticorruption projects there is an instance of bottom-up citizen-driven anti-corruption online evaluations of doctors’ work in hospitals (originally developed through the homepage: www.halapenz.hu). This webpage indicated which doctors accepted bribes at for example maternity wards in

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3 This indicates a trend towards more government funding since, for example, in 2000 state funding constituted 28% of overall resources, 16% domestic donations and membership fees and 6.3% from foreign donors. The remaining part came from service fees, unrelated business activities and income on capital (Rose-Akerman 2005: 171).
public hospitals. Information provided spurred media uproar against corruption in the health care sector, which together with police is considered as the most corrupted area in Hungary (Szántó and Tóth 2008: 82). Yet, the website was ordered to be closed down quickly after it became broadly known because the ombudsman indicated that it was revealing personal information of doctors which breaks the law (TI GCR 2006: 71). Litigation against any of the doctors was not initiated. However, the homepage is still running on various servers outside the reach of Hungarian authorities (e.g. Tokelau Islands) resulting in a considerable database as well as an active online community (see database on Hungarian projects).

Beyond this, Transparency International Hungary is generally active in lunching anti-corruption campaigns which yield regular media attention. Still, its projects are far from being known by the whole population. In this relative void, media plays a crucial role in investigating corruption and thus fighting it.

Media

When it comes to media, freedom of speech and press are legally guaranteed, nonetheless, interviewed journalists say that there are cases of self-censorship because mainstream media do not want to risk conflicts with politicians in the matter of corruption (TI NIS 2007: 68). Another characteristic feature of Hungarian media is high involvement of foreign capital which however does not advance the fight against corruption either (TI NIS 2007: 67-68).

Transparency International suggests that investigation of corruption scandals is patchy and selective though the frequently shows up. Only two weekly papers with an editorial ownership, namely Élet és Irodalom and Magyar Narancs cover corruption issue to a greater extent. However, due to their low budgets they cannot afford paying good investigative journalists (TI NIS 2007: 68). In general, Hungarian media uncover couple of high-level incidents of corruption per year, but often only thanks to leakages from political opponents and not thanks to their investigations (FH 2006, 2007, 2008; FH NIT 2004; 2008, TI NIS 2007: 67-68).  

4 Author’s note: My personal impression is that with the collapse of one of the major, ex-government coalition member parties (SzDSz) the leakages significantly increased and led to much more court cases as well. There is, unfortunately, no evidence on this since this is a particularly new development.
When it comes to electronic media, internet access in 2007 had 35% of population (in 2005 number of broadband users climbed by 95%) and electronic information services develop quickly (FH 2005; 2007). The leading online magazine, Index, has become particularly active in uncovering corrupt activities often times going as far as intervening into the cases themselves by lunching court cases. For example, it pressurized the municipality of Budapest by suing it to disclose data of a major bridge reconstruction highly criticized for costing more than twice than initially planned. Subsequently, the magazine received the demanded documents and struck a deal with the municipality that the magazine creates a regularly updated page publishing all the contracts, bills, and official documents of the bridge reconstruction (see this homepage in Hungarian at http://index.hu/belfold/budapest/2009/09/11/megszamoljuk_a_hidpenzt/).

GOVERNMENT AND POLITICAL SOCIETY

Was the government anticorruption carried out in good will and effective? Make a stakeholder analysis of anticorruption; who, from government agencies, are the promoters, who the neutrals and who the resistant. How did this come about historically (through electoral cycles)? What about political parties? Are politicians elected on anticorruption tickets? Are corrupt politicians elected? Are some parties associated with more or less corruption?

Private business and political parties are perceived as two groups of actors that are most strongly affected by corruption in Hungary, respectively 4.3 and 4.2 in the 2009 Global Corruption Barometer survey. Also the political parties are seen as the single most corrupted sector by 42% of respondents and private sector by 34% (TI GCB 2009: 28-31).

Anti-corruption programs of the government. According to 2009 GCB, 70% of population considers government’s efforts to fight corruption as ineffective. In 2008 a number of skeptics was the same, but a number of positive attitudes was higher and amounted to 11% while in 2009 it was only 7% (TI BPI 2008:19). Insufficient anti-corruption programs ran by the subsequent governments have not
changed much in society perception of corruption. It seems that those programs are not supported with political will and serve more as a lip service.

An important step against corruption among politicians was made during the pre-election campaign in 2001 when Fidesz-led government introduced new regulations on declaring income, assets and interests by the MPs. 2001 witnessed also adoption of the Comprehensive Strategy Against Corruption. Moreover, before 2002 elections both the socialists and the liberals ran the campaigns under anti-corruption slogans (TI NIS 2007: 27). This anti-corruption platform in a great deal paved the way to their victory (FH NIT 2004: 17). There is also a center-right opposition party, MDF, which names anti-corruption activities as the main plank of its program, however, its proposals are unspecific and lack detailed recommendations. Current electoral campaign (elections in spring 2010) will be interesting to watch, although opposition party Fidesz has now 65% popular support, which does not bode well for an interesting campaign and ambitious promises.

In 2003 the Parliament passed through a ‘Glass Pocket’ law (Üvegzseb törvény) which aimed at enhancing the transparency of public spending, greater transparency on conflict of interests as well as income and assets of politicians and some public servants; moreover it strived to broaden the scope of action of the State Audit Office (SAO). Although law is detailed and matches European standards, the implementation is heavily lacking.

In 2006, a law on lobbying was passed which spelled out more detailed regulations about contacts between representatives of interests and politicians/civil servants (FH NIS 2007: 20). However, multiple reports on corruption point out that Hungary lacks a clear legal framework on receiving gifts by state officials (GRECO 2008: 7), which opens manifold possibilities for corruption.

In October 2007 a comprehensive government program ‘New Order and Freedom’ was launched. A state secretary from Ministry of Justice was named to coordinate work on amending the law on political party financing, conflict of interest and reforming administration (TI GCR 2009: 343). In August 2007 the Anti Corruption Coordination Board was established to draft an anti-corruption strategy in cooperation with NGOs and non-governmental experts. The Board plays only an advisory role and does not possess any punitive powers. The strategy was accomplished in 2007, however, the government has not taken any steps in order to implement it. As a result of this some experts and NGOs quitted the Board. In December 2007 also the Anti Money Laundering Action Plan was accepted, which
envisages, *inter alia*, trainings in the subject of international corruption for civil servants. The latter have been recommended by GRECO in its evaluation reports (GRECO 2005: 5, 8; 2008: 2-3).

In November 2008, the prime minister Ferenc Gyurcsany proposed new anti-corruption measures, which among others include whistleblowers protections (FH 2009), however, the effects have to be still seen.

**Political Parties.** Political parties are perceived as the most corrupted sector in the country (TI GCB 2009: 28-31). It is an open secret that the funding limits for electoral campaigns are gravely exceeded by the parties and that this money comes from business sector, which awaits special favors after the election. There is no evidence supporting that one or another party would be less corrupted among those in the parliament. Unfortunately, interviews with businessman indicate that corrupt practices span across political boundaries both at the local and national levels increasingly leading to institutionalized forms of corruption (Pálinkó et al 2008).

The above abuses take place despite the fact of existing of a supreme audit agency, the State Audit Office (SAO), which among others its duties shall carry out audit of the parties. In fact the SAO checks the parties, but only the materials that have been delivered to the Office by the parties. The SAO does not take any steps to investigate into the real costs of political campaigns that is why anti-corruption organizations and reports widely criticize the Office’s inactivity and limiting interpretation of its mandate (TI NIS 2007: 30). Moreover, political parties use legal loopholes to gather money, e.g. they set up foundations through which they can legally receive money from anonymous donors, which cannot be tracked at all (TI NIS 2007: 27). From the recent developments in October 2009 FH together with TI presented a draft of a political campaign financing bill that proposes to address present deficiencies and aims against corrupt activities (FH 2009).

**Whistleblowers.** Hungarian law has evident deficiencies in the area of protecting whistleblowers, which could be helpful in fighting corruption (TI 2009: 31). Only within the private sector, a company that informs about a cartel agreement is protected by the law. There is no such protection for civil servants, judges, prosecutors etc. Although in November 2008 some new regulations were introduced on whistleblower protection their results are not known yet (FH 2009).

**Politicians and public officials.** Another significant deficit may be noticed in the field of *post-employment* and *conflict of interest* regulations. The former

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5 Nevertheless, it must be noted that SAO is itself is laden with corruption problems (Semjén and Tóth, 2004, 2009)
currently applies to the MPs (cannot take seat in a regulated sector or concession dependent companies for next 2 years), however those rules do not encompass ministerial officials, who are much more prone to corruption with businesses (GRECO 2008: 7-8; TI NIS 2007: 20, 28). When it comes to the assets, income and interests regulations, they are spelled out in the law and are obeyed by the MPs, however, their implementation is weak among public administration officials. Moreover hospitality rules (gifts, dinners, holidays etc.) are obscure and leave much space for corruptive activities (GRECO 2005: 12; 2008: 7).

In terms of immunity, the MPs are protected during the whole electoral term and cannot be sued for activities that they have done either within or outside fulfilling their political tasks. Political mandate of MPs may be revoked only on basis of conflict of interests (TI NIS 2007: 25-26). There were cases of forcing single ministers or high ranking officials out of office after e.g. media disclosed corruption scandals, however, the MPs are well protected by the immunity rules.

Hungarian government has taken steps to enhance the awareness of public officials as well as police officers, prosecutors, and judges about corruption both international and domestic. Currently it runs a two-year (2008-2010) anti-corruption training program for managerial positions, which aims to increase a number of notification about illegal activities. There have been also trainings for judges and prosecutors, like one organized in 2003 and 2004 by the US Department of Justice including bribery and money laundering as well as foreign corruption (TI NIS 2007: 87). In 2005 Greco noticed that formal regulations for dismissing prosecutors from a given case were not sufficient (GRECO 2005: 6-7).

VOTERS

*Is participation to corruption broad? Is the public losing because of corruption? How upset are they? Look for survey data in the countries and Gallup on Transparency Site (Bribe Index, Global Corruption Barometer).*

Corruption in Hungary is a widely spread phenomenon and some people do not even consider bribery as a kind of corruption. Moreover, corrupt companies are not perceived as particularly bad, and in fact many people think that running a business in Hungary without corrupt activities is not possible (TI NIS 2008: 10). In the health sector 77% of respondents said that it was typical to give a gratitude
payment (TI NIS 2007: 14). Also 72% of respondents said that in a well know oil mafia case (Fazekas, 2009b) only some scapegoats have been caught, while the real perpetrators and politicians, who are definitely involved, have gotten away without punishment (TI GCR 2001: 131). The latter, however, may also reflect the lack of faith in police capacity to work efficiently. On the other hand, in comparison to other countries in the region, quite a large number of Hungarians, 35%, said in 2005 that less than a half of public officials is corrupted (an average value for the whole region was 22%) (TI GCR 2006: 41). Moreover in 2003 GRECO stated:

Hungary is perceived as one of the least corrupt post-communist countries in Central and Eastern Europe. According to Transparency International’s corruption perception index 2002, Hungary was ranked 33 out of 102 countries (rating 4.9 out of 10). Its economy is among the strongest in the region. (GRECO 2003: 3)

Those numbers from 2003 and 2005 painted a rosy picture of Hungary, the recent data presents a more gloomy picture. As mentioned above perception surveys indicate, corruption in last 5-10 years in on the rise. Additionally as much as 70% of Hungarian thought that governmental actions against corruption were ineffective and only 7% believed they brought positive results. Respective numbers for the whole EU were 56% and 24% (TI GCB 2009: 28). However, such a negative perception might be partly caused by political events related to the previous prime minister Mr. Gyurcsány, who with his statements about lying to the society about the state of Hungarian economy, managed to turn public opinion against the government. All in all, however, implementation of the anti-corruption laws leaves much to wish. Indeed the implementation and not creation of new regulations should become the main area of focus for the consequent governments. Reports and evaluations mainly point toward public tenders, party financing, whistleblower protection, however, also speeding up courts proceeding as well as the simplification of the tax system and lessening of the administrative burden should be high on the agenda (TI 2009: 31; TI NIS 2008: 35-36).
1. TIMELINE OF THE MAIN ANTI-CORRUPTION LAWS AND ACTIONS

<table>
<thead>
<tr>
<th>Year</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>1997</td>
<td>Since 1997 the MPs have to submit declarations of interests, income and assets, however, the system lacks any check mechanisms thus does not operate</td>
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<tr>
<td>2001</td>
<td>Latvian Financial Action Task Force amended its black list of non-cooperative countries in the fight against money laundering and included HU onto it</td>
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<tr>
<td>2001</td>
<td>Orban cabinet launches Governmental Strategy Against Corruption</td>
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<td>2002</td>
<td>Anti-Corruption Department was established (10 members), and changed in 2007 into Anti-Corruption Coordination Board</td>
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<tr>
<td>2003</td>
<td>The largest banking and money-laundering scandal in Hungary</td>
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<td>2003 Apr</td>
<td>‘Glass pocket’ law passed through the Parliament</td>
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<td>2004 Feb</td>
<td>Established the Advisory Body for Public Life without Corruption (later evolved into Anti-corruption Coordination Body/Board)</td>
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<td>2004</td>
<td>HU introduces legal limits of the duration of the MPs immunity only to a period until which electoral mandate expires</td>
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<td>2004</td>
<td>Act on Public procurement implemented. Since then on it was changed 5 times a year</td>
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<tr>
<td>2004</td>
<td>Anti-corruption Department was moved under umbrella of National Investigation Office and increased to 14 staff member</td>
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<tr>
<td>2004</td>
<td>Introduction of corporate criminal liability law (but implementation is a challenge)</td>
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<td>2007 Oct</td>
<td>Program launched: ‘New Order and Freedom’</td>
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<td>2007 Aug</td>
<td>Anti-Corruption Coordination Committee/Board established consists of 26 high rank public servants and 28 individuals from NGOs and scientific institutions</td>
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<tr>
<td>2007 Dec</td>
<td>New law in force on anti-money laundering. Improves the legal framework. All investigations in that issue went under umbrella of Customs and Finance Guard (before both police and customs were responsible)</td>
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<tr>
<td>2008 Apr</td>
<td>The act on Transparency of Subsidies Provided from Public Funds, introduces stricter conflict of interests regulations</td>
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<td>2008 June</td>
<td>Competition Act 1996 (Act LVII of 1996, on ‘Prohibition of Unfair Market Behaviour and Limiting Competition’) was amended, now a firm that discloses the cartel will be let free while other will be charged</td>
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<tr>
<td>2008 Nov</td>
<td>A new anticorruption legislation proposed that was modeled on the U.S. False Claims Act and included whistleblower protections</td>
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2. STAKEHOLDER ANALYSIS

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<tr>
<th>Power</th>
<th>Promoters</th>
<th>Neutral</th>
<th>Anti A-C</th>
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<tr>
<td>Strong</td>
<td>Investigative journalists (very few)</td>
<td>SAO (passive)**</td>
<td>Main Political parties</td>
</tr>
<tr>
<td>Average</td>
<td>EU*</td>
<td>Whistleblowers (public administration and officials)</td>
<td>Corrupted politicians and public officials (central and local level)</td>
</tr>
<tr>
<td>Weak</td>
<td>Coalition of</td>
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<td>Ambassadors</td>
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<tr>
<td>• Business groups</td>
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<td>• European Audit Office</td>
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<tr>
<td>• Press (2 independent</td>
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<tr>
<td>weekly papers)***</td>
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<tr>
<td>• Foreign chambers of</td>
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<td>commerce</td>
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<tr>
<td>• Grass root actions</td>
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<tr>
<td>(private websites)</td>
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* seems that the EU was much more effective in pressuring Hungary in the pre-accession period than in the post-accession era. However, the EU made Hungary create anti-corruption laws and legal framework, which now has to be implemented.

** SAO does not possess prerogatives to implement its findings and to punish controlled bodies, but can present the matter and inform prosecutors and police about illegal activities, not to mention may go to media

*** 2 relatively small weekly papers with editorial ownership, they present from time to time material on corruption, but have financial problems (Élet és Irodalom and Magyar Narancs) (TI NIS 2007: 68)

Other actors:
- **Anti-corruption NGOs**: Eötvös Károly Public Policy Institute, Hungarian Helsinki Committee, Hungarian Civil Liberties Union
- **Business groups**: Hungarian Lobby Union, Hungarian Chamber of Commerce and Industry, Confederation of Hungarian Employers and Industrialists
- **Foreign chambers of commerce**
- **Coalition of ambassadors (main foreign investors) formed Transparency Working Group**
- **Transparency Group of Hungarian Business Leaders’ Forum**
- **Hungarian Donors Forum (established in 2006)**

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