



Office for Democratic Institutions and Human Rights

HUNGARY

PARLIAMENTARY ELECTIONS

12 April 2026

ODIHR NEEDS ASSESSMENT MISSION REPORT

15-19 December 2025



Warsaw
21 January 2026

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I. INTRODUCTION

Following an official invitation from the authorities of Hungary to observe the parliamentary elections to be held on 12 April 2026, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 15 to 19 December 2025. The ODIHR NAM included Kseniya Dashutsina, ODIHR Senior Election Adviser and Martina Barker-Ciganikova, ODIHR Election Adviser. The NAM was joined by Daria Boyarskaya, Senior Adviser of the OSCE Parliamentary Assembly.

The purpose of the mission was to assess the pre-election environment and the preparations for the parliamentary elections. Based on this assessment, the NAM should recommend whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from state institutions, as well as with representatives of political parties, media, civil society, and international organizations. A list of meetings is annexed to this report.

ODIHR would like to thank the Ministry of Foreign Affairs and Trade of Hungary for their assistance and co-operation in organizing the NAM. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and share their views.

II. EXECUTIVE SUMMARY

On 13 January, in line with the law, the President called the parliamentary elections to be held on 12 April. The 199 members of parliament will be elected for a four-year term under a mixed system. The upcoming elections take place in a highly polarized and increasingly charged political environment shaped by economic challenges, resulting social discontent, growth of a new opposition political force and competing narratives about the country's international alignment. Interlocutors from civil society, independent media and opposition political parties emphasized the further tightening of the civic space and decline of the rule of law, as well as increased pressure on the conduct of their regular work in recent years. All ODIHR NAM interlocutors stressed the significance the upcoming elections and expect a high voter turnout.

Several aspects of the election-related legislation were amended since the last parliamentary elections, including with respect to constituency boundary delimitation, campaign finance, and procedural rules pertaining to the electoral process. Many ODIHR NAM interlocutors raised concerns that the reform process lacked inclusiveness and genuine consultation, and opined that the amendments further exacerbated the already existing advantages of the ruling party. Many prior ODIHR recommendations, including those related to suffrage rights, the electoral-boundary delimitation, prevention of the misuse of administrative resources and blurring of state and party functions, media freedom, campaign finance, and citizen observation remain unaddressed.

The electoral process is administered by a parallel three-tiered structure with the National Election Commission (NEC) primarily overseeing compliance with the law and the National Election Office (NEO) supervising the administrative part of the elections. Preparations are ongoing and no specific challenges were noted by the election administration. Most ODIHR NAM interlocutors expressed general confidence in the technical capacity of the NEC and NEO, and the election administration

stressed their preparedness to conduct elections effectively and professionally. However, a number of interlocutors raised concerns over the impartiality of the election administration at all levels stating that the appointment procedure and its politicized composition impact independent decision-making; a concern exacerbated by the recent removal of voting rights of delegated members, who were nominated by political parties without a fraction in Parliament. Additionally, several stakeholders highlighted challenges, related to transparency of the electoral process and potential malfeasance at polling stations on election day, specifically in rural areas.

The right to vote is granted to all citizens, except those disenfranchised by an individualized court decision due to mental incapacity or criminal conviction. In-country voter registration is passive and 8,078,733 voters are currently included in the centralized voter register maintained by the NEO. While most ODIHR NAM interlocutors did not raise concerns with the accuracy of the voter register, they expressed concerns about weakened safeguards against manipulations of voter registration and potential “voter tourism”.

Every citizen with voting rights is eligible to stand as a candidate. Candidates may run in single-member constituencies and on national lists concurrently. Interlocutors from political parties met by the ODIHR NAM did not express concerns with the technical aspects of the registration process. Some parliamentary opposition parties informed the ODIHR NAM they would not contest the elections to increase the chances of electoral victory of the opposition *Tisza* party.

Women are underrepresented in public and political life, with 31 out of 199 members (15.6 per cent) in the outgoing parliament, and none of the 13 ministers in the current government. There are no special legislative measures to enhance women’s active participation in political life and most parties met by the ODIHR NAM stated they do not have specific internal policies to promote women candidates.

ODIHR NAM interlocutors anticipate an intense and polarized campaign employing a mix of traditional and online campaign methods. Parties met by the ODIHR NAM did not express concerns with respect to their ability to campaign freely, but many ODIHR NAM interlocutors voiced serious concerns about an unlevel playing field which they anticipate being caused mainly by lack of separation between state and ruling party resources and activities. Campaigning by public officials is not explicitly restricted by the law, and the use of administrative resources in the campaign is not prohibited; in this regard, concerns were also noted with announcements of social benefits by the ruling party in the pre-election period. In addition, several interlocutors noted concerns about pressure on voters and vote buying and some parties pointed to intimidation of their candidates.

The vast majority of interlocutors expressed serious concerns about spread of misinformation, in particular online, use of artificial intelligence in the campaign to discredit the opponents, and foreign interference to impact the integrity of the electoral process. The appointed Digital Services Coordinator informed the ODIHR NAM that notwithstanding a series of adopted measures to counter misinformation, the scope of its authority and mandate to enforce action and sanction violations remains limited. Many ODIHR NAM interlocutors raised concerns that activities in the online space remain insufficiently monitored.

A number of aspects of the campaign finance legislation were amended since the last elections, including elimination of caps on political party campaign spending through an emergency procedure in June 2025. Most prior ODIHR recommendations, in particular with regard to transparency and accountability of campaign finances remain unaddressed. The legislation does not provide for limits on individual donations and interim reporting, and third-party campaigning remains unregulated, including on social networks. Overall, most ODIHR NAM interlocutors questioned the limited

enforcement capacity of the oversight institutions and expressed a low level of confidence in the transparency and efficiency of the party and campaign finance legislation and its implementation.

The media landscape mirrors the political polarization in the country and diverse media outlets mostly align with political narratives. The media operate in a highly concentrated market. The majority of ODIHR NAM interlocutors noted that this negatively impacts media pluralism, the independence of editorial policies and limits the diversity of views. Opposition parties raised concerns about lack of access to the public broadcaster and many interlocutors criticized its impartiality and independence due to disproportionate coverage of the ruling party. The National Media and Info-communications Authority (NMHH) informed the ODIHR NAM that they are planning to conduct qualitative and quantitative monitoring of a number of television and radio channels and to issue weekly media monitoring reports.

The legal framework provides for an expeditious electoral dispute resolution process. There are no guarantees to public hearings at any level of election dispute process, but all decisions are published in the official journal and online. The composition of Supreme Court judicial panels for adjudicating election-related disputes was expanded from three to five members. In 2023, Hungary implemented judicial reforms aimed at improving judicial independence; however, a number of ODIHR NAM interlocutors expressed general concern over the independence of the adjudicating bodies and pointed to the fact that this perception may diminish public confidence in their decisions.

There are no provisions for citizen election observation of any aspect of the process, including election day, despite OSCE commitments and previous ODIHR recommendations. The legislation provides for international and party observers, and political parties the ODIHR NAM met with confirmed their intention to deploy representatives across the country, depending on the availability of resources. CSOs informed the ODIHR NAM that many citizen observers will register as observers affiliated with political parties.

All ODIHR NAM interlocutors welcomed a potential ODIHR election observation activity, viewing it as a means to promote confidence in the electoral process amid a highly polarized political environment, and the majority stressed a strong need for a large-scale presence. Representatives of authorities stated that an ODIHR observation activity, including on election day, would enhance transparency and demonstrate the effectiveness of the electoral process. Key areas that would benefit from further assessment include the legal framework and its implementation, the work of the election administration at all levels, accuracy of voter registration, the conduct and regulation of the campaign, including online, media coverage of the elections, transparency of campaign finances, and the effectiveness of electoral dispute resolution. Additional concerns that would merit attention by an ODIHR election observation activity were expressed regarding a number of aspects, including vote buying and intimidation, voter tourism, and partisan actions by the lower-level election administration, particularly in smaller and economically disadvantaged municipalities on election day.

On this basis and taking into account the various findings, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 18 long-term observers to follow the electoral process countrywide and 200 short-term observers to follow election day proceedings. In line with ODIHR's standard methodology, the EOM would include a media monitoring element.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Hungary is a parliamentary republic with legislative powers vested in the unicameral parliament and executive power exercised by the government, led by the prime minister.¹ The ruling Hungarian Civic Union (*Fidesz*) held majority in parliament since 2010, and following the 2022 parliamentary elections formed a coalition with the Christian Democratic People's Party (KDNP) for the fourth time.² Viktor Orbán, leader of *Fidesz*, was subsequently re-elected prime minister, and is now serving his fifth term.

On 13 January 2026, in line with the Constitution, President Tamás Sulyok set parliamentary elections to be held on 12 April. The upcoming elections take place in a highly polarized and increasingly charged political environment shaped by economic challenges, resulting social discontent, and competing narratives about country's international alignment. Additionally, the landscape is shaped by foreign policy challenges, including the effects of the war in Ukraine, resignation of high-level officials,³ as well as the emergence and growing popularity of a newly established opposition party *Tisza*.⁴ All ODIHR NAM interlocutors stressed the pivotal significance of these elections expecting a high voter turnout.

The 2023 Sovereignty Protection Act established the Sovereignty Protection Office (SPO) to investigate foreign-funded groups influencing politics.⁵ In 2024, the European Commission referred Hungary to the EU Court of Justice (CJEU) arguing the law and the SPO violated several provisions of the EU law, including the right to freedom of expression, data protection and internal market rules.⁶ In May 2025, a new bill "on transparency in public life" was submitted by *Fidesz* with the aim of expanding the powers of the SPO to investigate and sanction organizations deemed as a threat to national sovereignty; its adoption is pending but several ODIHR NAM interlocutors raised concerns about possible negative impact on freedom of association and expression during the elections if the bill is adopted. Interlocutors from civil society, independent media and opposition political parties emphasized the further tightening of the civic space, decline of the rule of law and increased pressure on their regular work in recent years.

¹ The prime minister is elected by the parliament. The president is the head of state and is indirectly elected by the parliament for a five-year term, with a two-term limit.

² *Fidesz*-KDNP won 135 out of 199 seats. The remaining seats were distributed between the joint opposition coalition United for Hungary comprising Democratic Coalition, Jobbik, Dialogue, Momentum, Hungarian Socialist Party, LMP-Hungary's Green Party with 57 mandates, and Our Homeland with 6 seats. All 13 national minority self-governments submitted a national-minority list, and the National Self-Government of Germans in Hungary gained a preferential mandate.

³ In 2024, two high-ranking politicians, President Katalin Novák and former Chair of the Committee on European Affairs Judit Varga, resigned following a scandal involving their decision in a pedophilic sexual abuse case.

⁴ Some parliamentary opposition parties informed the ODIHR NAM they would not contest the upcoming elections to increase the chances of electoral victory of the *Tisza* party.

⁵ The act extended the ban on funding from abroad to independent candidates and non-partisan groups.

⁶ The ruling in the CJEU case (C-829/24) is pending. On 25 November, the European Parliament (EP) passed a new [interim report](#) reaffirming and expanding calls for the European Council and Commission to act against Hungary for violations of the EU law. The EP noted that Hungary's situation has continued to deteriorate, partly due to the lack of progress in protecting the rule of law, and reiterates Hungary's transformation into a "hybrid regime of electoral autocracy", once again calling for direct action under Article 7(2) Treaty on European Union (TEU). The Council of Europe's European Commission for Democracy Through Law (Venice Commission) called on Hungary to repeal the law due to its chilling effect on civil society, media and political opposition. The Commission in its [opinion](#) found the law overly broad, lacking justification, and a threat to free expression.

Women are underrepresented in public and political life, with 31 out of 199 members (15.6 per cent) in the outgoing parliament, and none of the 13 current ministers. Only 2 out of 26 government commissioners, as well as the government spokesperson are women.⁷

ODIHR has observed six parliamentary elections in Hungary since 1998. Most recently, ODIHR deployed an Election Observation Mission (EOM) for the 3 April 2022 parliamentary elections and referendum.⁸ The final report contains recommendations for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.⁹

B. LEGAL FRAMEWORK

Parliamentary elections are primarily regulated by the 2011 Fundamental Law (Constitution), the 2011 Act on the Elections of Members of Parliament, the 2013 Act on Election Procedure, and the 2013 Act on the Transparency of Campaign Costs (Campaign Finance Act).¹⁰ In October 2025, the government extended the declared state of danger until 13 May 2026, which enables the government to rule by decree, override any act of parliament, and suspend the application of certain laws. Hungary is party to major international and regional instruments related to the holding of democratic elections.¹¹

Several aspects of election-related legislation were amended since the last parliamentary elections, including technical and procedural rules pertaining to election day and the composition of the election administration.¹² These encompassed removal of voting rights from NEC members delegated by parties with no parliamentary groups. In 2024, the Parliament adopted changes to electoral district boundaries and some adjustments to voting procedures, such as abolishing the use of envelopes to cast ballots, except for absentee voting and voting at foreign representations, and removing the obligation to bring a residence card to the polling station.¹³ In June 2025, amendments to campaign finance legislation lifted campaign expenditure limits. Many ODIHR NAM interlocutors raised concerns that the reform process lacked inclusiveness and genuine consultation, and the amendments further exacerbated the already existing advantages of the ruling party.¹⁴

While ODIHR NAM interlocutors from state institutions expressed satisfaction with the legal framework, several other interlocutors noted that it would benefit from further improvement in a

⁷ See Article 29 of the of the [UN CEDAW 2023 Concluding observations](#) on the ninth periodic report of Hungary, in which the Committee “remains concerned that women are still underrepresented in decision-making positions, including in the Parliament, academia, the judiciary, the public service [...]”. Other voiced concerns include the hate speech towards women in politics, as well as at the lack of targeted measures, including temporary special measures.

⁸ See previous ODIHR election [reports](#) on Hungary.

⁹ In paragraph 25 of the [1999 OSCE Istanbul Document](#), OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”.

¹⁰ Other relevant legislation governs political party finances, the rights of national minorities, the media, citizenship and civil registration, criminal offences, and court proceedings, and also includes binding regulations issued by the Minister of Justice and other acts and guidelines of the National Election Commission. The Supreme Court may, on its own initiative, render binding decisions to ensure the uniform application of law within the judiciary.

¹¹ Including the [1966 International Covenant on Civil and Political Rights](#), [1979 Convention on the Elimination of All Forms of Discrimination Against Women](#), [1965 International Convention on the Elimination of All Forms of Racial Discrimination](#), [2003 Convention against Corruption](#), [2006 Convention on the Rights of Persons with Disabilities](#), the [1950 European Convention on Human Rights](#). In 2014, Hungary signed the Council of Europe Convention on preventing and combating violence against women and domestic violence, but in 2020 it did not ratify it with the justification it promotes dangerous gender ideology.

¹² In 2023, further amendments were introduced pertaining solely to the conduct of municipal elections.

¹³ While ODIHR NAM interlocutors from state institutions, including the election administration, opined the amendments to voting procedures were mostly technical in nature, interlocutors from civil society and opposition expressed concerns some might compromise the secrecy of the vote.

¹⁴ The Ministry of Justice stated that all relevant laws underwent a legally required consultation process.

number of areas underlined by prior ODIHR recommendations, including those related to suffrage rights, the electoral-boundary delimitation, prevention of the misuse of administrative resources and blurring of state and party functions, media freedom, campaign finance, and citizen observation.

C. ELECTORAL SYSTEM

The 199 members of parliament are elected for a four-year term under a mixed system: 106 are elected in single-member constituencies by first-past-the-post voting and 93 are elected from closed candidate lists in a nationwide proportional contest through a partially compensatory system, with varying thresholds of 5 per cent for parties standing individually, 10 per cent for two-party coalitions, and 15 per cent for coalitions of three or more parties. Parties that pass the threshold have the surplus votes from single-member majoritarian contests added to the totals before the proportional seat allocation.¹⁵ Voters who have self-declared that they belong to a national minority may choose to vote for one of the 13 national minority lists, in which case they do not participate in the vote for the national party lists.¹⁶

In 2024, boundaries of 39 single-member constituencies (more than one third) were redrawn, including the capital Budapest which lost two seats (from 18 to 16), while the surrounding Pest County gained two seats (from 12 to 14).¹⁷ While most ODIHR NAM interlocutors agreed the delimitation was necessitated by demographic changes and the fluctuating number of registered voters, many criticized the lack of a comprehensive review of all constituencies, and noted that the amendments were adopted to favour the ruling party by grouping the opposition-leaning areas into larger constituencies and splitting others into several districts. They opined that the act was adopted in an expedited manner without public consultation and meaningful participation of the opposition in the parliamentary discussions.¹⁸

D. ELECTION ADMINISTRATION

The elections are administered by a parallel three-tiered administration comprised of the NEC, 106 Constituency Election Commissions (CoECs), and 10,048 Polling Station Commissions (PSCs). In addition, the National Election Office (NEO), 97 Constituency Election Offices (CoEOs), and some 1,251 Local Election Offices (LEOs) are responsible for the conduct of the elections and for providing assistance to the respective commissions in their decision-making.¹⁹

Election commissions comprise elected and delegated members. The NEC is a permanent independent body composed of seven members elected by parliament with two thirds of the votes for

¹⁵ The surplus votes are the votes the party's losing single-member constituency candidates received and the votes of the party's winning candidates over and above those needed to win a seat.

¹⁶ In 2023, the ECtHR judgment in [Bakirdzi and E.C. vs Hungary](#), found that the system of national minority voting was in violation of the ECHR. National minority lists have a preferential threshold to elect a representative to the parliament and receive a non-voting parliamentary spokesperson in case they do not win a seat. Currently, of the 13 registered national minorities only 2 have sufficient number to elect an MP; the remaining 11 can only elect a spokesperson.

¹⁷ The law does not require periodic review of constituency boundaries by an independent expert body and boundaries can only be changed with two-thirds parliamentary support.

¹⁸ See also the Venice Commission June 2025 [opinion](#) which criticized both the procedure and the substance of the amendments, citing concerns of gerrymandering expressed by the opposition and demographic experts. ODIHR in its 2022 Final Report recommended a new delineation of boundaries by an independent body in an inclusive and transparent manner as there was a significantly unequal distribution of registered voters amongst the constituencies.

¹⁹ In addition, there are 20 Regional Election Commissions, 20 Regional Election Offices and 151 foreign representation election offices.

a nine-year term.²⁰ Only one of the seven permanent NEC members is a woman. In addition, political parties that have a faction in parliament can each delegate one member to represent them in the NEC in between elections. Entities fielding national proportional lists can delegate a member to the NEC after candidate registration is finalized.²¹ In line with a 2022 amendment, NEC members delegated by non-parliamentary parties standing for the next elections do not have voting rights within the NEC and decisions on complaints regarding violations during the campaign, on election day and on election results are thus adopted without their votes.²² There is no readily available sex-disaggregated data regarding the composition of election administration bodies.

The NEO is a state administrative body tasked with the technical preparation and administration of the elections; its head is appointed by the president based on a proposal from the prime minister for a nine-year term.²³ Lower-level offices are headed by municipal clerks and act as secretariats for the election commissions at the corresponding level.

In September 2025, the Minister of Justice issued two technical decrees regulating conduct of the elections.²⁴ The ODIHR NAM was informed that the digitalization of different aspects of the electoral process is continuing, and the NEO has also updated its website to facilitate access to information about the electoral process. Sessions of election administration bodies at all levels shall be open to the public either by being streamed or through in-person attendance.²⁵

Election administration informed the ODIHR NAM that preparations at all levels are ongoing and they do not foresee any specific challenges impeding its work. Following a request from LEOs, the NEO launched a public online campaign to recruit sufficient polling staff, using social networks and contact with universities. To enlarge the number of applications, the remuneration for lower-level polling staff was increased and following an amendment, all PSC members are granted an official day off after the election day. The ODIHR NAM was informed of ongoing training for polling staff as well as voter education efforts, in particular with regard to the voting and counting procedures and the use of new forms and annexes on election day.

A number of provisions for voters with disabilities are in place and according to the NEO, almost 80 per cent of PSCs are accessible. The ODIHR NAM was informed that information for voters will be available in easy-to-read format, including online. On election day, the regulations provide for assisted voting by a person of choice and voters with visual impairment can make use of *Braille* sleeves.

²⁰ The CoECs and PSCs consist of a chairperson and two members elected by the relevant county or local representative body, based on proposals from the respective election offices. Electoral contestants can also appoint one member to each CoEC and two members to each PSC, serving dual roles as commissioners and party agents.

²¹ Parties contesting jointly are only eligible to designate one NEC member. National minority self-governments that register a list can also each delegate a NEC member who has voting rights only on issues affecting national minorities.

²² While several ODIHR NAM interlocutors criticized this measure as potentially jeopardizing the impartiality of the decision-making process given the majority the ruling party holds within the NEC, the election administration informed the ODIHR NAM that such a change was necessary as previously discussions were not substantiated and only held along political lines.

²³ Up to three vice-presidents, appointed for indefinite terms, assist the NEO president.

²⁴ These detail salaries for polling staff and definition of their responsibilities, protocol samples and forms, the update of election data in the established IT systems as well as the budget, and timely release of the funds for the elections. One more decree detailing the electoral timeline is to be published once the day of the election is officially set.

²⁵ The 2024 amendments to the Act on Election Procedure allowed for the holding of sessions using electronic communication means only, upon decision of the chair, if appropriate publicity of the meeting is secured; some ODIHR NAM opined this might negatively impact transparency of the election administration work.

Most ODIHR NAM interlocutors expressed general confidence in the technical capacity of election administration, and the NEO stressed their preparedness to administer elections effectively and professionally. However, a number of ODIHR NAM interlocutors raised concerns over the impartiality of the election administration at all levels stating that the appointment procedure and its politicized composition impact independent decision-making, in particular following the removal of voting rights of delegated members, who were nominated by political parties without a fraction in Parliament. Additionally, several stakeholders highlighted challenges, related to transparency of election process, including with respect to access to all stages of the electoral process, adjudication of electoral disputes, and potential malfeasance at polling stations on election day, specifically in rural areas.

E. VOTER REGISTRATION

In-country voter registration is passive for those with domicile in Hungary and voter lists are extracted from the civil registry.²⁶ The central voter register, which currently includes 8,078,733 voters, is maintained by the NEO. Voters over 18 years old, and married citizens who are 16 years or older are automatically included in the voter register.²⁷ Those disenfranchised by an individualized court decision due to mental incapacity or criminal conviction are not eligible to vote.²⁸ Voter lists are updated on a daily basis and not displayed for inspection, but individuals can check their records either in person at the LEO offices or online. In 2024, the deadline for closing of the voter register was shortened by one day to facilitate the timely printing and distribution of voter lists.

While most ODIHR NAM interlocutors did not raise concerns with the accuracy of the voter register, they highlighted weakened safeguards against manipulations of voter registration, in particular the possibility to change residency from the actual place of residence to the address used for official communication with the authorities, possibly facilitating “voter tourism” including by voters registering fictitious addresses for the purpose of voting in a different constituency.

Voters eligible to cast their votes at Hungary’s diplomatic representations abroad have to apply to the NEO to be registered.²⁹ There are two different voting methods for voters abroad. Voters abroad with an in-country residence can vote in-person at the designated Hungarian embassies or consulates for both the national proportional and majoritarian contests, whereas voters abroad without domicile in Hungary are eligible to vote by post for the national proportional list component only.³⁰ Many ODIHR NAM interlocutors criticized these differing modalities for out-of-country voting as challenging the principle of equal suffrage and expressed concerns about the postal voting procedures

²⁶ The civil registry contains data based on the Personal Data and Address Registry and the central register of travel documents. The National Court Office and the Criminal Registry provide data on those deprived of suffrage rights.

²⁷ The legislation provides for several alternative voting methods. Mobile voting, including in prisons and health care facilities can be requested up until 12:00 on election day without an indication of a specific reason. Absentee voting can be requested up to nine days before election day.

²⁸ Article 29 of the 2006 [UN Convention on the Rights of Persons with Disabilities](#) (CRPD), states that to “ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected”. Regarding criminal conviction, the law does not guarantee the proportionality of the decision and length of disenfranchisement, for instance, allowing disenfranchisement even for minor offences.

²⁹ A voter does not need to re-register and their records remain active for voting by post if they vote or amend their data at least once every 10 years.

³⁰ The provision for postal voting extends mostly to ethnic Hungarian communities in neighboring countries, who were granted citizenship following an amendment to the Act on Hungarian Citizenship where individuals whose ancestors were Hungarians could be naturalized on preferential terms. In 2015, the ECtHR in [Vámos and Others v. Hungary](#) concluded that the distinction was not discriminatory.

and safeguards.³¹ The ODIHR NAM was informed that in an effort to automatize the electoral process, the registration for absentee and out-of-country voting is also possible online via the NEO website.

F. CANDIDATE REGISTRATION

All eligible voters can stand as candidates. Candidates may run in a single-member constituency and on national lists concurrently. Candidates for single-member constituencies can be nominated by one or more nominating organizations or run independently. To register a candidate list for the proportional race, each party or coalition needs to nominate candidates in at least 71 constituencies spanning over 14 counties and the capital.³²

The NEC is in charge of registering the proportional lists; candidates in single-member constituencies must collect at least 500 signatures from eligible voters in that constituency on approved signature sheets and submit them to the respective CoECs.³³ Decisions of the CoECs on candidate registration are subject to final appeal to the Regional Election Commission. The election administration has four days for signature verification and the law provides for an opportunity to correct omissions and mistakes. The NEO launched an online portal enabling voters to verify if their data has been used in support of any single-mandate candidate and to report misuse to the relevant authorities. ODIHR NAM interlocutors did not express concerns with the technical aspects of the candidate registration process.

There are no special legislative measures to enhance women's participation in public and political life and most parties met by the ODIHR NAM stated they do not have specific internal policies to promote women candidates.³⁴ Several parties started organizing nation-wide primaries to select their candidates.

G. CAMPAIGN ENVIRONMENT

The official campaign starts 50 days before election day; nevertheless, all ODIHR NAM interlocutors stated that an intense campaign is already underway.³⁵ There is no campaign silence period, with the exception of the prohibition to broadcast political advertisements in the media on election day. Campaigning by public officials is not restricted by the law, and the use of administrative resources in the election campaign is not prohibited. Prior ODIHR recommendations to introduce legislative measures to ensure a level playing field, fair campaign and equality of opportunities remain unaddressed.

³¹ The NEO informed the ODIHR NAM that 448,950 voters are eligible to vote by post from abroad.

³² Candidates who do not win a mandate are removed from the candidate list and withdraw their nomination in writing.

³³ CoEC decisions on candidate registration can be appealed to the higher-level election administration. National minority self-governments have to collect support signatures from at least 1 per cent of the voters included in that minority's register, but no more than 1,500 signatures.

³⁴ In Article 21 of the [UN CEDAW 2023 Concluding observations](#) on the ninth periodic report of Hungary, the Committee noted "with concern the limited understanding within the State party of the non-discriminatory nature and importance of temporary special measures to accelerate the achievement of substantive equality of women and men, including through statutory quotas for women's representation in the public and private sectors, in particular with regard to rural women, Roma women and girls, women with disabilities and older women".

³⁵ The NEO informed the ODIHR NAM that it does not have mandate to deal with any breaches of campaign regulations prior to the official campaign period and several ODIHR NAM interlocutors opined that there is lack of accountability in such cases, including with regards to posting of billboards already now visible across the country.

Many ODIHR NAM interlocutors expressed concerns about a lack of separation between state and party activities, through the prominence of the government in the political advertising market, government-sponsored communications identical with the messaging of the ruling party, including through so-called national consultations, and limited availability of billboard space for all contestants due to a concentration of ownership of commercial billboards.

Concerns regarding announcements of social benefits by the ruling party were also voiced.³⁶ In addition, several interlocutors noted the potential for pressure on voters during the campaign, including on civil servants, the organization of transport for voters residing outside of Hungary and vote buying, specifically targeting vulnerable groups, including Roma.³⁷

Parties met by the ODIHR NAM did not express concerns with respect to their ability to campaign freely; nevertheless, all but the ruling party noted insufficient financial resources to conduct an efficient campaign, and a considerable imbalance in resources in comparison with the ruling party. ODIHR NAM interlocutors anticipate an intense and polarized campaign with personalized accusations and the potential use of harsh and divisive rhetoric, including anti-migrant and anti-LGBTI narratives, and some parties pointed to intimidation of their candidates.³⁸

Political parties met by ODIHR NAM stated that the campaign will focus on the domestic economy, including corruption and living standards, security, migration, as well foreign policy, labour and social issues. Contestants informed the ODIHR NAM they plan to campaign primarily through social networks, but also using traditional campaign methods, including small assemblies, door-to-door campaigning, as well as various printed materials and media advertising. *Fidesz* has launched digital initiatives for political messaging, including the “Digital Civic Circles” and the “Fight Club”, intended as discussion forums of *Fidesz* supporters and an online recruiting process for activists, respectively. *Tisza* party has started a “Road to Victory” campaign tour aiming to visit all the municipalities in an attempt to win rural areas, traditionally prone to vote for *Fidesz*.

The vast majority of interlocutors expressed serious concerns about the spread of misinformation, in particular online, use of artificial intelligence in the campaign to discredit opponents, and foreign interference to impact the integrity of the electoral process.³⁹ The National Media and Communications Authority (NMHH) informed the ODIHR NAM about a series of measures it has taken in its new role as the Digital Services Co-ordinator (DSC). These include the adoption of an internal Action Plan, issuance of decrees, launch of a specifically dedicated website, co-operation, including in form of organized roundtables, with other relevant state institutions such as the National Cybersecurity Centre, judicial bodies, and the election authorities, as well as online information exchange with Very Large Online Platforms (VLOPs) and the European Commission.⁴⁰ At the same time, the NMHH raised concerns that with regard to the rules set in the Digital Services Act governing

³⁶ In the run up to the elections, the Prime Minister announced several government-spending measures, including housing subsidies for public servants, a special pension top-up initiative as of 1 January, and tax cuts for families.

³⁷ The law does not prohibit taking pictures of the ballots, which according to some ODIHR NAM interlocutors may allow for pressure on voters on election day and facilitate vote-buying. Several interlocutors also referred to the case of [Tiszabura](#) village where by-elections were repeated three times due to alleged electoral fraud and vote buying.

³⁸ In April 2025, the parliament passed constitutional amendments to ban Pride marches. Some ODIHR NAM interlocutors voiced concerns over the role and involvement of the church in the campaign.

³⁹ In November 2025, the European Parliament [noted](#) concern over “the increasing use of unlabelled AI-generated political content in Hungary [...], notably the deliberate posting of deepfake videos on social-media channels closely linked to the prime minister’s political party and campaign, and their coordinated amplification”. *Tisza* party informed the ODIHR NAM about orchestrated AI-generated messages to discredit the party, including related to alleged *Tisza*’s plans to raise taxes or to reintroduce military conscription once in power.

⁴⁰ In 2024, the NMHH issued three decrees pertaining to the issues of trusted flaggers, out-of-court dispute settlements and supervision fees to be paid by those online platforms established in Hungary. Another decree on information sharing between all DSCs is being prepared.

the powers of the European Commission, and respectively the DSCs, the scope of their authority is limited, lacks legal instruments to enforce actions or sanction violations against very large online platforms, and there is need for additional clarification of competences and cooperation between different bodies. Many ODIHR NAM interlocutors raised concerns that activities in the online space remain insufficiently monitored.

H. PARTY AND CAMPAIGN FINANCE

Party and campaign finance is regulated by the 1989 Political Parties Act and the 2013 Campaign Finance Act. The June 2025 amendments to the campaign finance legal framework, adopted at an extraordinary parliament session in an emergency procedure, lifted the campaign expenditure cap.⁴¹ In December 2025, the Parliament adopted an amendment to prohibit indirect foreign funding of political parties. Most ODIHR NAM interlocutors criticized both the procedure and the substance of these amendments and perceived them as favouring the ruling party. Otherwise, the legislation remains largely unchanged and prior ODIHR and the Council of Europe's Group of States against Corruption (GRECO) recommendations, in particular with regard to transparency and accountability of campaign finances remain unaddressed. The State Audit Office (SAO) emphasized that the current campaign-finance framework would benefit from revision to address shortcomings.⁴²

The legislation provides both for public and private funding. Donations to political parties or contestants from legal entities, foreign individuals or states, as well as anonymous donations are prohibited. Public funding is available to political parties whose lists obtained at least 1 per cent of votes cast in parliamentary elections.⁴³ In January 2023, public funding for parliamentary parties was substantially increased. Nominating organizations and independent candidates have to return funds if they receive less than 1 per cent of the votes. Both parties and candidates can receive private donations from individuals. The law does not provide for disclosure of campaign donations, nor does it set any caps on individual donations to political parties for their regular activities or contestants for the campaign. Donations to political parties exceeding HUF 500,000 a year shall be identified in the parties' annual reports. Third-party campaigning and spending remain unregulated despite prior ODIHR and GRECO recommendations, and, in view of many ODIHR NAM interlocutors is prevalent.⁴⁴

There are no provisions for interim reporting; contestants are only obliged to publish a statement on their campaign incomes and expenditures in the National Gazette within 60 days of election day. Campaign finance oversight is vested with the SAO which audits the campaign finances of the candidates and list nominators that obtained parliamentary mandates; those who did not obtain

⁴¹ In accordance with the parliamentary Rules of Procedure, the process was defined as an "urgent discussion". Previously, a party could spend up to HUF 5.9 million for each candidate (some EUR 15,700; EUR 1 equals 386 Hungarian Forints (HUF)).

⁴² The SAO informed the ODIHR NAM about a letter they submitted to the president of the Parliament in June 2025 in which the institution identified existing loopholes and proposed stricter regulations, in particular with regards to third-parties, the use of public assets in the campaign, more clarity with respect to itemization of campaign reports, insufficient sanctions in case of failure to submit campaign finance reports and harmonization of regulations for candidates and nominating organizations when it comes to the use of public funds.

⁴³ Single-member constituency candidates receive HUF 1.2 million per candidate, and entities nominating candidate lists for the national proportional contest receive a sum proportional to the number of candidates nominated.

⁴⁴ Despite the lack of regulation, the SAO informed the ODIHR NAM that in the audit of the 2022 parliamentary elections, the SAO carried out a broad examination of campaign activities and campaign expenditures, which were in the interest of the political parties but incurred by organizations outside political parties and the court confirmed that the SAO, acted within its scope of responsibility and lawfully established prohibited support from a third-party organization in the case of the political parties being sanctioned.

mandates may be audited only based on a request by other contestants.⁴⁵ Several ODIHR NAM interlocutors noted that the SAO lacks investigative capacity and its mandate is not extended to monitoring campaign financing but merely to verification of the submitted information. According to the SAO although it looks at all campaign spending online and well as for traditional campaigning, monitoring of online campaign spending constitutes their biggest challenge in particular given loopholes in the legislation and lack of cooperation from platforms, and the digital and social media campaigning thus remains limited.⁴⁶ The SAO informed the ODIHR NAM that they prepared guidelines for political parties, including self-testing rules, detailing all relevant regulations, and are continuously working to improve its methodology.

Overall, most ODIHR NAM interlocutors expressed a low level of confidence in the transparency and efficiency of the party and campaign finance legislation and its implementation, in particular given a lack of expenditure limits, and expressed concerns about the regulation and control of third-party campaigning, including on social networks, absence of clear reporting obligations, and limited enforcement capacity of the oversight institutions.

I. MEDIA

The media-related electoral legal framework remains unchanged since the last parliamentary elections. The media landscape mirrors the political polarization and diverse media outlets mostly align with political narratives. The majority of ODIHR NAM interlocutors noted that this negatively impacts media pluralism, the independence of editorial policies, limits the diversity of views, and negatively impacts opportunities for smaller or new parties to reach voters.⁴⁷ While online media is popular, television continues to serve as an important source of information, especially in rural areas. Alongside the public broadcaster Media Service Support and Asset Management Fund (MTVA), the private broadcasters RTL and TV2, are the main television channels. Interlocutors from private media outlets informed the ODIHR NAM about challenges to obtain access to public information from government and state institutions, including denial of access to press conferences and state events and unanswered inquiries.

The media operate in a highly concentrated market.⁴⁸ Through a very recent acquisition, in November 2025, *Blikk*, the most widely read independent daily tabloid, was bought by Indamedia Group, which is seen as close to Prime Minister Orban. Prior to this, the change of ownership of the largest news portal Index and the subsequent shift of its editorial policies further increased concentration. The

⁴⁵ The State Treasury administers campaign subsidies for candidates and political parties, but it verifies only the spending of subsidies for single-mandate candidates, on the basis of reports submitted after election day.

⁴⁶ The relevant provisions of the EU Regulation on the Transparency and Targeting of Political Advertising have not yet been transposed to the national legislation. Representatives of the SAO noted a lack of cooperation from major platforms and their unresponsiveness to requests for data on political advertisements during the audit of the 2022 parliamentary election campaign.

⁴⁷ In Reporters Without Borders's 2025 World Press Freedom [Index](#), Hungary ranks 68th out of 180 countries. On 11 December, the European Commission [opened](#) a formal infringement procedure against Hungary for failure to comply with EU media freedom rules that guarantee press independence and protect journalists and their sources. The procedure concerns the European Media Freedom Act (EMFA) and the Audiovisual Media Services Directive (AVMSD). In July 2024, Hungary has challenged the EMFA before the ECJ, arguing it infringes national sovereignty and lacks proper legal basis.

⁴⁸ In 2018, there was a simultaneous transfer of the ownership of 476 media outlets, including the main regional print media, to the Central European Press and Media Foundation (KESMA). Local newspapers are owned by KESMA's company, Mediaworks. On 30 September 2025, the Parliamentary Assembly of the Council of Europe (PACE) in its [Resolution 2617\(2025\)](#) reiterated its concerns regarding the concentration of media ownership, the lack of media pluralism and the political influence over media content.

government remains the largest advertiser in the media market and many interlocutors opined public funds are frequently directed to government-allied media outlets.⁴⁹

Several interlocutors representing independent media informed the ODIHR NAM about precarious working conditions contributing to a chilling effect on their work, including intimidation, smear campaigns and the use of harsh rhetoric, restricted access to information, and low remuneration, with women journalists disproportionately affected by these issues.⁵⁰

By law, media are obliged to ensure fair and balanced political coverage. The 600 free minutes of airtime on the public broadcaster is to be equally divided among the lists; 470 minutes for proportional and 130 minutes for national minorities lists. The public broadcaster informed the ODIHR NAM about its plans to set up a Public Media Election Office and cover the elections extensively, including by organizing debates among contenders, and editorial and news coverage of campaign events. A voter education campaign airing NEC and NEO messages is also envisaged. While the public broadcaster reiterated its commitment to comply with the legal obligations, a high number of ODIHR NAM interlocutors strongly criticized its independence and impartiality and representatives from both parliamentary and non-parliamentary opposition raised concerns about the lack of access to the public media.

The Members of the Media Council are elected by two-thirds majority of the Parliament and the president of the NMHH also chairs the Media Council, which has responsibilities over media content regulation. The law gives the Media Council the right to nominate candidates for the executive directors or CEOs of public media. Many ODIHR NAM interlocutors raised concerns about the independence of the media regulator and its effectiveness in ensuring the independence of public service media and increasing transparency regarding the distribution of state advertising. The NMHH informed the ODIHR NAM that in line with the legal obligations they will conduct monitoring of a number of political news and current affairs programmes, release weekly media monitoring reports on its website, and will inform any complainants if a complaint does not fall within the jurisdiction of the NMHH, where it can be addressed.

J. ELECTORAL DISPUTE RESOLUTION

The legal framework provides for an expeditious review process for all election disputes, with three days to file a complaint and three days to render a decision.⁵¹ Complaints concerning violations in single-member constituency elections, including against local media, are filed with CoECs, while complaints related to nationwide election issues are considered by the NEC.⁵² NEC decisions can be appealed to the Supreme Court, and the constitutionality of the Supreme Court decisions can be challenged to the Constitutional Court. Following a 2025 amendment, the judicial panels of the

⁴⁹ On 4 June 2025, the OSCE Representative on Freedom of the Media [emphasized](#) the importance of ensuring that both public service broadcasters and media regulatory bodies are independent from political influence, and addressed the issue of independent and fair allocation of state advertising. The 30 September 2025 PACE resolution asked the Hungarian authorities, “given the state’s and state-owned companies’ extremely significant role in the media advertising market, through which they channel significant state resources to pro-government media, to ensure that the distribution of such advertising, including on social media, is fair and transparent”. According to [monitoring](#) by the CSO Political Capital so far for the 2026 elections, government-organized actors account for 87 per cent of the total amount of political advertisements on Google and Meta.

⁵⁰ On 11 December, the European Commission [noted](#) that Hungarian authorities interfere with the work of journalists and media outlets by restricting their economic activities and editorial freedom.

⁵¹ A 2024 amendment shortened the deadline for the Constitutional Court for considering an application and delivering a final decision from six working days to five days; the Court did not express any concerns regarding the timeline.

⁵² CoEC decisions on candidate registration can be appealed to the respective higher-level commission; CoEC decisions on any other issues are appealed directly to the NEC.

Supreme Court adjudicating election-related disputes were expanded from three to five members. The Supreme Court judges informed the ODIHR NAM that they do not foresee issues with effective consideration of cases and the amendment was required to reflect changes in the general rules for consideration of administrative cases. Some ODIHR NAM interlocutors indicated this could lead to changes in the case allocation order due to case overload and raised concerns about the impartiality of the judges involved.

There are no guarantees to public hearings at any level of election dispute process contrary to international standards and prior ODIHR recommendations. The Constitutional Court informed the ODIHR NAM that it is at its' discretion to organize a public hearing in a matter of public interest.⁵³ The involved parties are not notified in advance that their case will be reviewed. Legal standing to appeal decisions of election commissions is granted only to those citizens and legal entities whose rights are 'affected by the case'. All decisions are published in the official journal and online. The Supreme and Constitutional Courts informed the ODIHR NAM about their preparedness to deal with election-related cases within the short deadlines; both courts also summarized previous election-related case law in order to facilitate swift consideration of cases.

In 2023, Hungary implemented judicial reforms aimed at improving judicial independence; however, a number of ODIHR NAM interlocutors expressed general concern over the independence of the adjudicating bodies and pointed to the fact that this perception may diminish public confidence in their decisions. Some ODIHR NAM interlocutors anticipated an increase in the number of complaints, including on election day, due to the apparent competitive and contentious nature of the elections.

K. ELECTION OBSERVATION

There are no provisions for non-partisan citizen election observation of any aspect of the process, including election day, despite OSCE commitments and a previous ODIHR recommendation. The legislation provides for party observers and representatives of intergovernmental organizations and international non-governmental organizations can register as international observers. Additionally registered political entities with a national list may appoint up to five observers to follow the count of postal ballots and the aggregation of election results at the NEO. Each political entity registered to run within the respective constituency may appoint up to two representatives to the PSC that both fulfil some functions of polling station commissioners as well as those of a party agent. Political parties the ODIHR NAM met with confirmed their intention to deploy representatives across the country, depending on the availability of their resources. CSOs informed the ODIHR NAM that many citizen observers will register as observers affiliated with political parties.

IV. CONCLUSIONS AND RECOMMENDATION

All ODIHR NAM interlocutors welcomed potential ODIHR election observation activity, viewing it as a means to promote confidence in the electoral process amid a highly polarized political environment, and the majority stressed a strong need for a large-scale presence. Representatives of authorities stated that an ODIHR observation activity, including on election day, would enhance transparency and demonstrate the effectiveness of the electoral process. Key areas that would benefit from further assessment include the legal framework and its implementation, the work of the election administration at all levels, accuracy of voter registration, the conduct and regulation of the campaign,

⁵³ Paragraph 12 of the [1990 OSCE Copenhagen Document](#) provides that "proceedings may only be held in camera in the circumstances prescribed by law and consistent with obligations under international law and international commitments." See Guideline II 3.3 of the Venice Commission's [Code of Good Practice](#) in Electoral Matters.

including online, media coverage of the elections, transparency of campaign finances, and the effectiveness of electoral dispute resolution. Additional concerns that would merit attention by an ODIHR election observation activity were expressed regarding a number of aspects, including vote buying and intimidation, voter tourism, and partisan actions by the lower-level election administration, particularly in smaller and economically disadvantaged municipalities on election day.

On this basis and taking into account the various findings, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 18 long-term observers to follow the electoral process countrywide and 200 short-term observers to follow election day proceedings. In line with ODIHR's standard methodology, the EOM would include a media monitoring element.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs and Trade

Péter Sztáray, State Secretary for Security Policy and Energy Security
Pál András, Ministerial Commissioner
Balázs Farkas, Head of Department, Consular Affairs
Csaba Rada, Head of Department, Security Policy and Non-Proliferation
Adrienn Kézsmárki, Co-ordinator

Ministry of Justice

Zoltán Gergényi, Deputy State Secretary
Levente Szabó, Head of Department
Zoltán Bibó, Head of Unit, Constitutional Law and Data Protection Department

National Election Office and National Election Committee

Attila Nagy, President of the National Election Office
Anikó Szabó-Unger, Head, Department/ Secretariat of the National Election Commission
Tamás Mucsi, Head, Organizational Affairs Department
Zoltán Juhász, Legal Expert
Krisztina Anita Kovács, Head, International and Press Department

State Audit Office

Ádám Bordás, Legal Director
László Klinga, Director of Audit
Imre Nagy, Advisor, Directorate
Andrea Kindl, Head, International and Protocol Directorate

Constitutional Court

Attila Szabó, Secretary General
András Mázi, Chief of Cabinet

Public Service Media / MTVA

Dániel Papp Dániel, Chief Executive Officer
Anita Altorjai, Director General, Duna Media Service
Zoltán Pető, Director, Media Programme
Zsuzsanna Krupp, Head, Director General's Cabinet
Péter Tarr, Head, Legal Services,
Krisztina Bándy, Head of Office International Relations

National Media and Communication Authority

Balázs Jó, Deputy Director
Balázs Székely, Head International Affairs Unit
György Ocskó, International Affairs Desk Officer
Emese Bene, Head of Online Platform Department

Supreme Court / Kúria

Kálmán Sperka, Deputy Head of the Administrative College
Tamás Sándor Sugár, Deputy Head of the Administrative College
Gábor Remes, Chair, Administrative Board
Ádám Miklós Balássy, International Director

Political Parties

Gergely Arató, Member of Parliament, Democratic Coalition
Tímea Szabó, Member of Parliament, Dialogue for Hungary (Párbeszéd)
Gábor Pajtkók, Deputy President, Legal Committee, Fidesz
Barbara Hegedűs, Member, Legal Committee, Fidesz
Éva Sebők, Member of Parliament, Momentum
Miklós Hajnal, Member of Parliament, Momentum
Ferenc Gelencsér, Member of Parliament, Momentum
Patrick Orosz, Member of Parliament, Our Homeland Movement
Sipos Richárd, Head of Office, Our Homeland Movement
Márton Melléthei-Barna, Director, Legal Affairs, Tisza
Péter Tóth, Campaign Director, Tisza

Media and Civil Society

Márta Pardavi, Co-Chair, Hungarian Helsinki Committee
Magda Major, Senior Legal Officer, Rule of Law Program, Hungarian Helsinki Committee
Dániel Döbrentey, Public Participation Program Expert, Voting Rights Project Coordinator, Hungarian Civil Liberties Union
Miklós Ligeti, Legal Director, Transparency International Hungary
Gábor Hacsí, Head of Research, Amnesty International
Róbert László, Election Expert, Political Capital
Dániel Róna, Director, 21 Research Center
Péter Krámer, Program Director, 20K
Gábor Polyák, Director, Mérték Media Monitor
Réka Sáfrány, President, Hungarian Women's Lobby
Enikő Pap, Legal Expert on Gender Issues, NANE Women's Rights Association and Hungarian Women's Lobby
Nóra Schultz, Political Analyst, Content Creator
Márton Kárpáti, Head of Content Development and Strategic Director, Telex
Dániel Simor, Video Journalist, Editor, Telex
Viktória Serdült, Journalist, HVG
Éva Bognár, President, Mediaforum Association
Béla Rácz, President, 1 Magyarország
Other representatives of media organisations

International Community

Representatives of international community resident in Hungary