



HUNGARIAN
COMPETITION
AUTHORITY

***PRESIDENTIAL REPORT
ON THE TERM OF OFFICE
OF THE GVH PRESIDENT
(2020-2025)***

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Six years in figures (2020–2025)

— 2020 — 2021 — 2022 — 2023 — 2024 — 2025

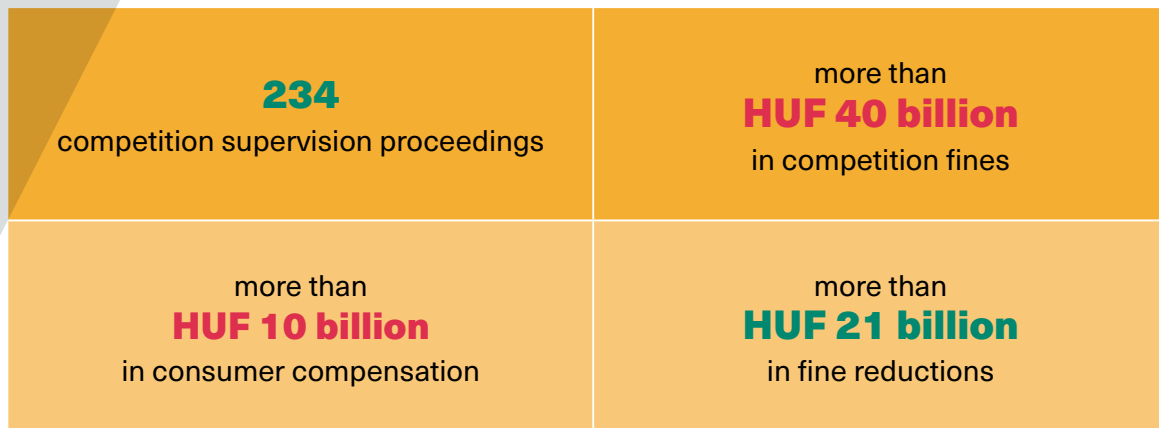
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In order to present the presidential term accurately, unless indicated otherwise, the cumulative data shown in the charts and figures below, as well as those appearing later in this publication, should be interpreted as referring to the time period between 15 April 2020 and 31 December 2025. Conversely, unless indicated otherwise, charts presenting annual trends always show full-year data. As a result, the sum of the figures shown in trend charts may differ from the cumulative data.

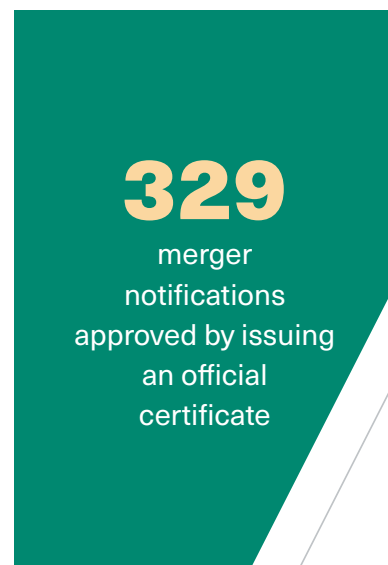
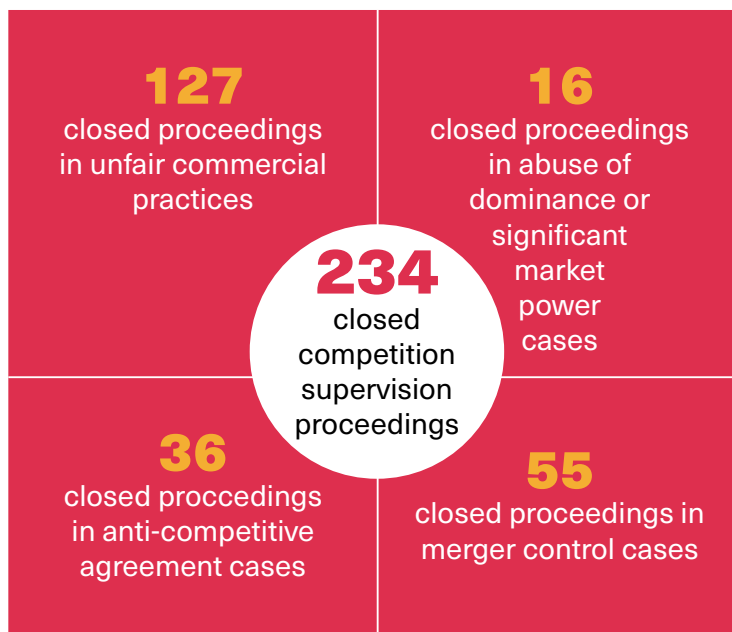
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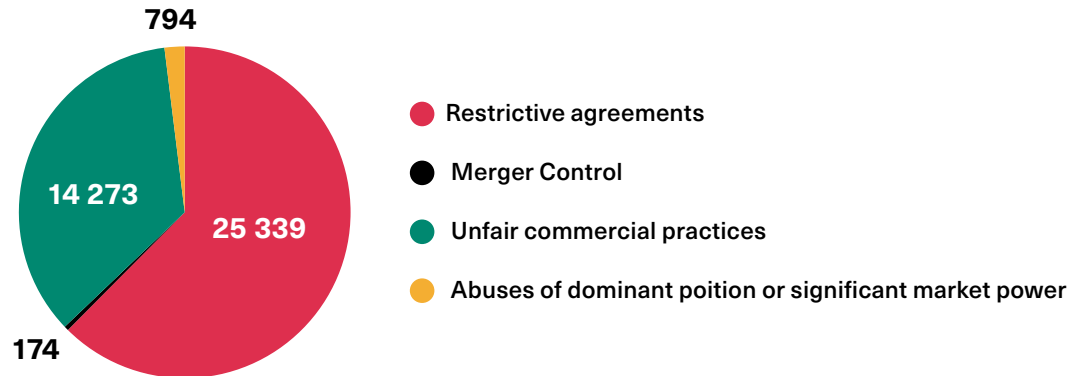


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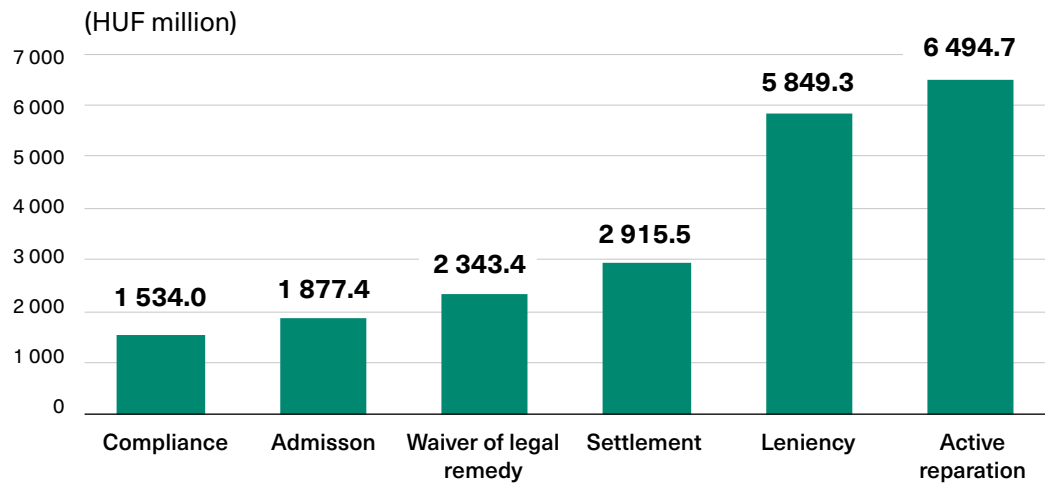


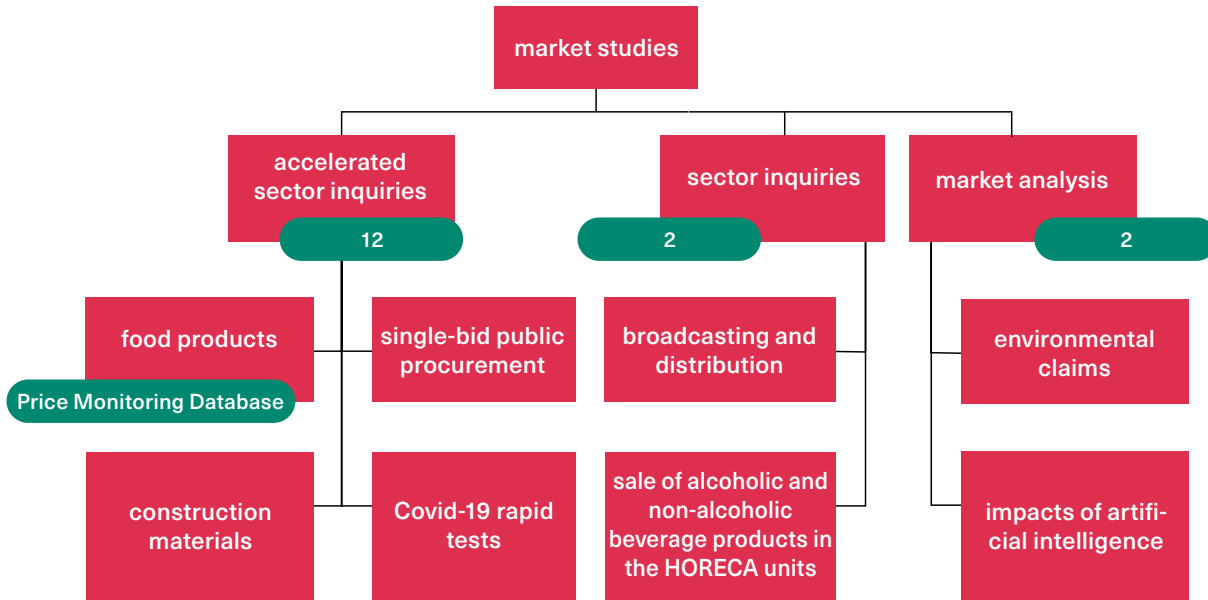


Cumulative amount of competition law fines imposed by the GVH by case type (HUF million)

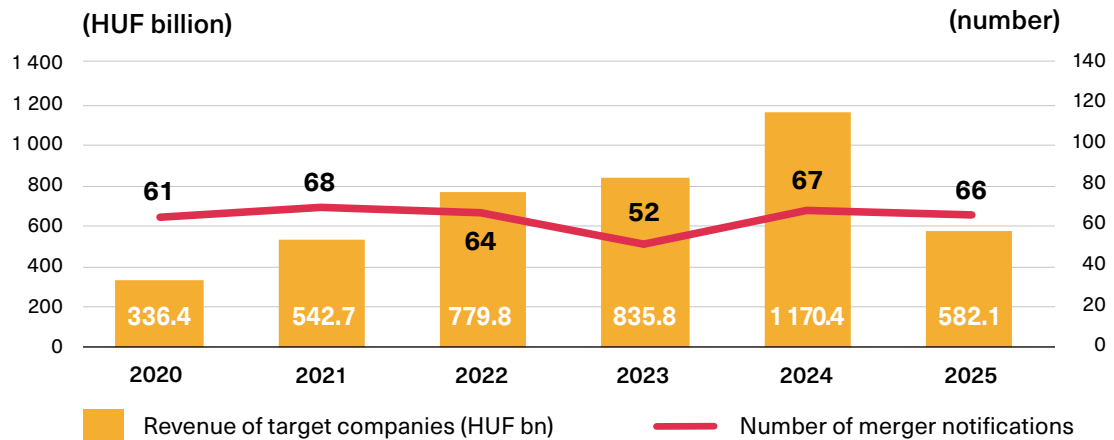


Cumulative amount of fine reductions granted by the Competition Council of the GVH sorted by cooperation type



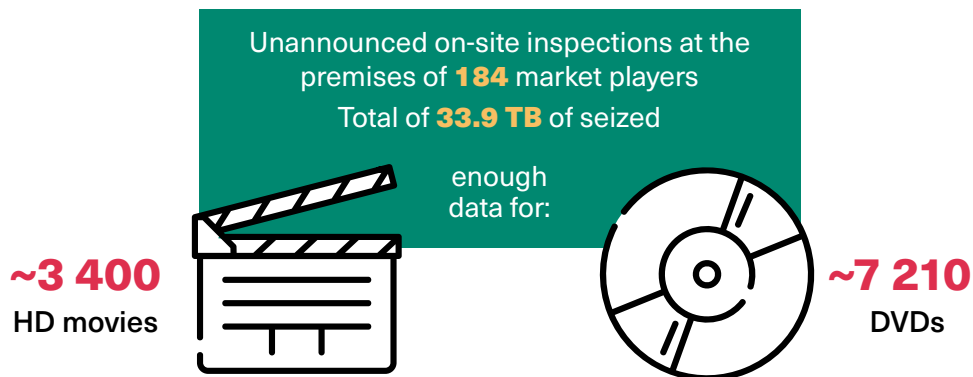


Trend of the number of merger notifications received by the GVH and the turnover of the target companies affected by the transaction

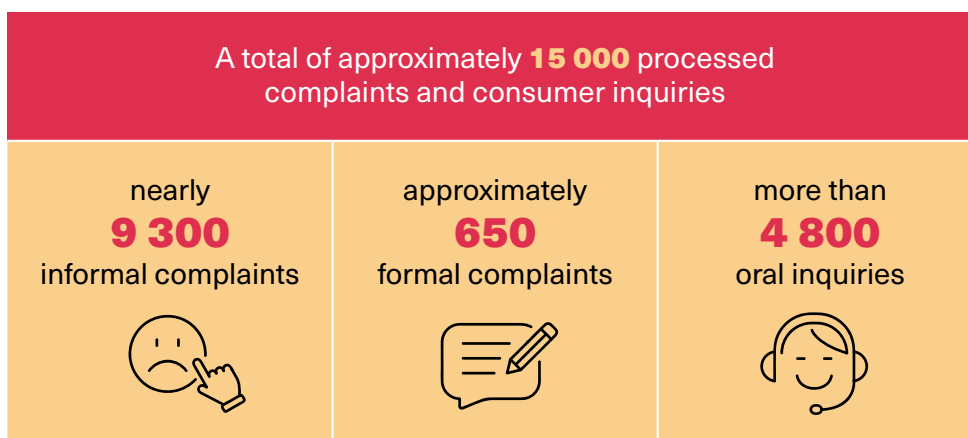




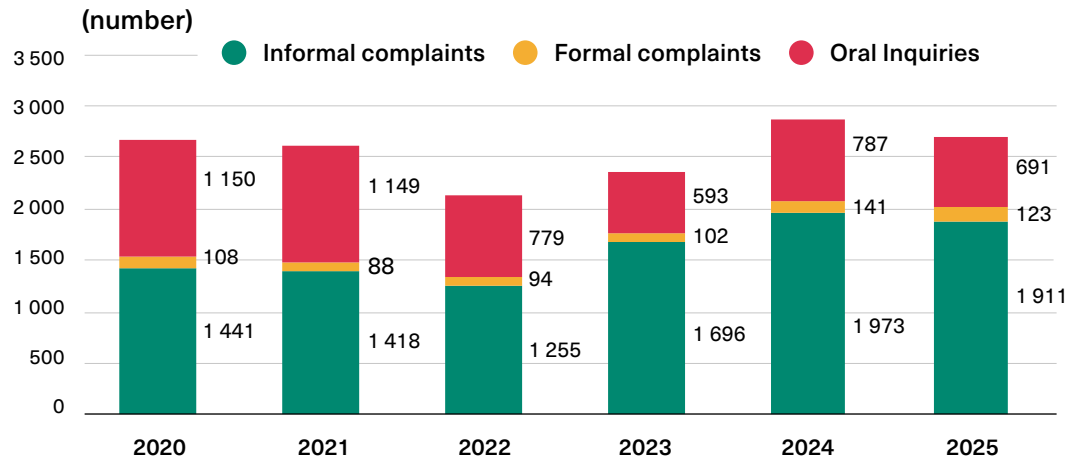
Our “spearhead” was on-site dawn raids



We listened to people and businesses

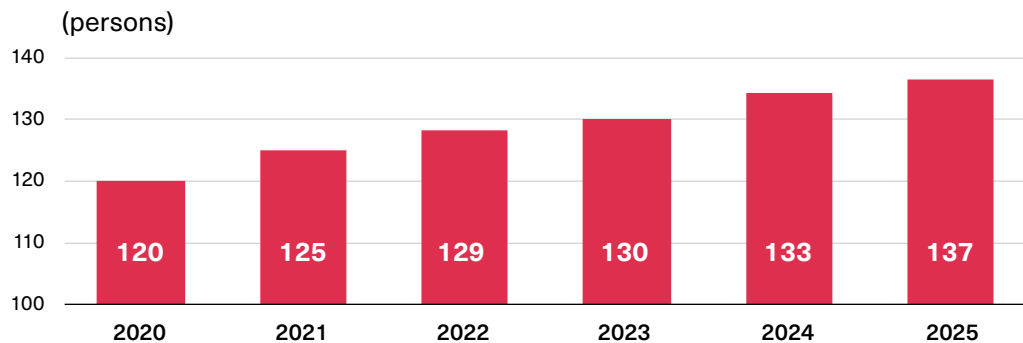


Trend in the number of complaints (formal and informal) and oral inquiries



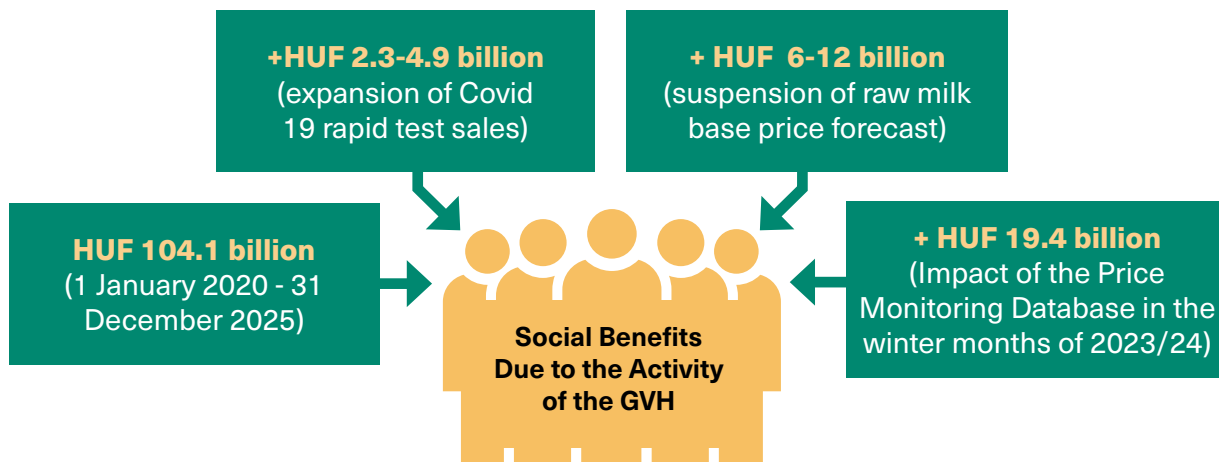
Expanding tasks, growing team

Development of the GVH's statistical average headcount





We delivered tangible benefits for Hungarians



We trust in the power of communication

nearly 600 press releases	around 1 000 interviews
12 issues of professional journals	4 professional volumes

We believed in families and children – a family-friendly workplace

79 employees raising minor children
142 minor children

Nearly HUF

9

billion in “fixed” fines paid into the central budget





***„So, in everything, do to others
what you would have them do
to you, for this sums up the Law
and the Prophets.”***

(Matthew 7:12)

Introduction

Over the past six years, together with my colleagues – the professional community of the national competition authority – we have striven every single day to protect the interests of the Hungarian people and to support businesses committed to compliance, while guided by the Gospel doctrine of fairness and mutual respect. The past six years have not merely been a chapter in the life of the national competition authority, but a period in which we collectively shaped and safeguarded one of the fundamental pillars of the Hungarian economy: fair and free competition. This account can only be comprehensive and objective if, together with my colleagues, we take stock of all the initiatives and commitments I undertook upon assuming the leadership of the Hungarian Competition Authority (GVH). Nearly six years ago, on 15 April 2020, I set the following principal objectives for myself and my colleagues:

Objectives in 2020

- 1. Accelerating competition authority proceedings:** I considered it essential to accelerate the GVH's proceedings in antitrust (cartel and abuse of dominance) cases, consumer protection matters, and complaint handling. I found the protracted competition supervision proceedings, lengthy judicial disputes, and the imposition of uncertain fines unsatisfactory. It was also concerning that sectoral inquiries could extend over one and a half to two years, despite the legitimate need—particularly during crises—to quickly identify potential market distortions using micro-level data. In merger control, there was also scope for reducing the administrative burden on undertakings.
- 2. Innovative renewal of organisational operations:** I advocated introducing innovative solutions within the GVH's operations to ensure that the authority could adapt to a rapidly changing economic environment and technological development. The spring of 2020 marked the beginning of a period full of crises. Pandemic lockdowns,



disrupted value chains, ongoing wars, and the energy crisis put economies to the test. In these changed circumstances, adaptation was required from everyone: governments, central banks, authorities, businesses, and consumers alike.

3. Protecting Hungarians - focus on families, children, the elderly, and the vulnerable: The primary responsibility / task of the national competition authority in a sovereign Christian country is the active protection of Hungarian consumers, with particular attention to our vulnerable, exposed members of society. Unfair commercial practices and fraud showed exponential growth, especially in in digitalized marketplaces.

4. Reducing uncertain fines imposed by the GVH: Over past decades, the Competition Council of the GVH imposed significant fines on infringing undertakings. A significant portion of these fines could not be definitively settled for years due to lengthy administrative court reviews initiated by the undertakings concerned. This situation was unfavourable both for the GVH and for the central budget, as fines had to be repaid with interest if the plaintiffs ultimately prevailed in court.

5. Expanding international networks and knowledge sharing: Together with my colleagues, we

committed ourselves to connectivity. International activities based on wide-ranging international engagement and active knowledge sharing – aligned with the country’s foreign policy priorities, have been crucial to the effectiveness of our work.

6. Increasing unannounced on-site inspections (dawn raids): Through dawn raids conducted with judicial authorization, the GVH can rapidly obtain micro-level market information and evidence, which is essential for effective competition supervision proceedings and for the timely detection of market distortions.

7. Strengthening the national competition authority’s societal impact: Proactive and wide-ranging communication and educational activities are of fundamental importance in ensuring that our work delivers tangible public value. Transparency and the provision of clear information are essential obligations of an authority committed to protecting Hungarian people and supporting businesses that provide livelihoods.

These objectives aligned with improving the GVH's effectiveness, safeguarding fair competition, and actively protecting consumer interests. Following my appointment, I took the view that the competition authority needed to adapt to modern economic challenges while maintaining fair competition and supporting sustainable economic development.

Looking back at our personal and shared institutional objectives, it is clear that we have made significant progress in achieving them.

- 1. We have succeeded in accelerating our proceedings**, most notably in merger control. In recent years, the share of cases assessed within 4 days by issuing an official certificate has steadily risen above 90%. The accelerated sector inquiry tool – unique even by international comparison – enables us to react at “hyper-speed” compared to our classic market study instruments. Through accelerated sector inquiries in the milk and dairy market and in the market for preserved food products, we succeeded in identifying profit-driven inflation. Based on these inquiries, I formulated competition advocacy proposals, including the introduction of the online Price Monitoring Database in Hungary, which since 1 July 2023 has contributed to curbing and containing food price inflation. With the presidential warning letter instrument – through which, in a closed setting, I draw companies' attention to concerns – we are able to close cases rapidly following complaint and notification proceedings.
- 2. We introduced numerous innovative technological developments** that enable far more efficient work than before, for example during dawn raids and data analysis and in the evaluation of evidence. As a result, we were able to significantly reduce the volume of unnecessarily seized data. The implementation of modern technologies, including ar-



tificial intelligence, is ongoing in the authority's operations. We approach the GVH's development with an innovative-driven mindset.

- 3. We directed attention on vulnerable consumers – children, the elderly, and the sick.** On the GVH's initiative, the family and family relationships, as values to be protected, were included into the Consumer Protection Act. We conducted numerous proceedings and launched educational campaigns to actively protect our more vulnerable members of society.
- 4. We succeeded in reducing uncertain fines imposed by the GVH.** In 2020, the GVH changed strategy: instead of uncertain fines, the Competition Council imposed legally sound, reliably "fixed" fines from the perspective of the central budget. In addition, the GVH offered undertakings subject to proceedings the cooperation options provided by the Competition Act. This approach ensured that high fines did not destroy jobs; instead, we ended infringements as soon as possible, and most undertakings returned to lawful conduct through commitments, active remediation, and compliance. Waiving the right to legal remedy resulted in lower but secure, fixed revenues for the central budget, about which I informed the minister res-

possible for the budget at the end of each year. Between 2020 and 2025, the "fixed" fine revenue reliably transferred into the central budget amounted to HUF 8.989 billion (approx. EUR 23.324 million).

- 5. We believed in international connectivity.** We built our international relations more broadly than ever before, on foundations that explicitly serve Hungarian national interests and rejecting bloc-based politics. In this framework, we strengthened professional relations with our Turkic and Far Eastern counterpart authorities as well. We successfully operated the OECD-GVH Regional Centre for Competition in Budapest (RCC) in 2025 marking its 20th anniversary. As President of the Hungarian Competition Authority, I joined the leadership of the two most important international organisations, the ICN and the OECD.
- 6. We collected an unprecedented volume of data (33.9 TB) through dawn raids.** We store and analyse a data volume equivalent to roughly 3 400 HD feature films using advanced hardware and software tools. I strengthened the legal and IT expertise of the Cartel Detection Section.

7. **We made the national competition authority visible. The GVH's recognition and social appreciation are important to us.** We placed strong emphasis on developing competition culture, proactive communication, education, and the broad societal impact of our work.

Over the past six years, the Hungarian Competition Authority not only served as a strict guardian of compliance with the law, but also contributed as an active actor to the development of markets, to preserving jobs in times of crisis, to strengthening business competitiveness, and to protecting consumer interests. Throughout our work, we kept in mind that competition is not merely a set of rules, but the engine of economic innovation, efficiency, and sustainable development.

This term brought numerous challenges, whether in relation to global economic and social changes, the technological revolution unfolding around us, or the increasingly complex functioning of market players. Amid all this, the Hungarian Competition Authority preserved its independence and strengthened its professional integrity and commitment to fair competition. None of this would have been possible without my colleagues' expertise, rock-solid dedication, and perseverance.

Special thanks are due to our partners, the legislators, the business sphere, and civil society, who through their support and cooperation contributed to ensuring that the instrument of competition law effectively serve the common good and economic growth.

As these six years has come to an end, I believe that the Hungarian Competition Authority will continue to preserve its strategic role in competition regulation and will contribute to Hungary's economic stability, innovation, and international competitiveness. The integrity of competition and the health of markets are our shared responsibility, which we must continue to serve with great dedication and professional commitment.

I thank everyone who took part in this collective work, and I thank you for honouring me with your attention.



Csaba Balázs Rigó
President of the Hungarian Competition
Authority (GVH)



Active and cooperative national competition authority

During my presidency, I considered it an important objective that the Hungarian Competition Authority should become a renewed, modern, and supportive authority. While the detection and elimination of unlawful conduct are crucial and remain a primary task, it is in the interest of all parties that such infringements be prevented through a competition-compliant corporate culture.

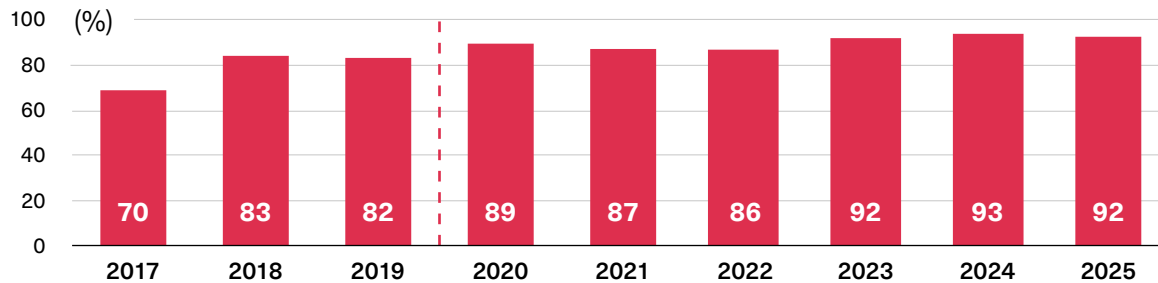
This renewed approach has several important dimensions, including ensuring the professional handling of consumer complaints, taking proactive educational measures, and increasing the fle-

xibility and speed of procedures. Facilitating the smooth operation of competition authority proceedings is not only a key element of efficient internal resource management, but also enhances predictability and reduction of bureaucratic burdens on the corporate side, thereby contributing to competitiveness and economic development.

Merger control

This objective of reducing bureaucracy proved to be particularly successful in the area of merger control. When notifying concentrations, undertakings can

Ratio of merger cases closed by issuing an official certificate to merger notifications



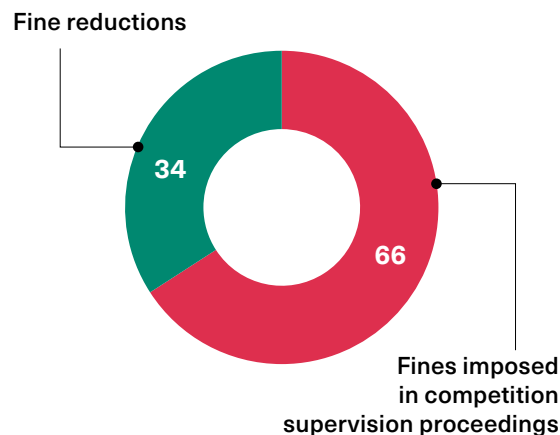
*The 2017 data include only transactions notified after 15 January 2017, and thus falling under the new notification regime.

obtain approval – by means of the fastest procedure, the so-called official certificate – on average within 4 days to implement their merger, provided that the absence of potential harmful effects on competition can be assessed sufficiently easily. Over the past six years, we have actively endeavoured to assess as many notifications as possible through this route.

To further reduce bureaucracy, as of 1 July 2023 the GVH has made it possible, in certain predefined categories of cases, to submit simplified forms, thereby providing undertakings with a more flexible and easier way to comply with data-submission requirements.

In addition, we support undertakings through preliminary consultations, so-called pre-notification procedures. These consultations help avoid pitfalls in concentration notifications – pitfalls that would otherwise trigger the initiation of competition supervision proceedings – and may even reveal that the transaction does not need to be notified at all. Preliminary consultations are extremely popular: in 2023, for the first time, we conducted such consultations before every proceedings; in 2024, the rate was 97%, and in 2025, it once again rose to 100%.

Ratio of fines imposed in competition proceedings and fine reductions (2020-2025)



Supporting undertakings, proactive development of competition culture

We support undertakings not only by reducing administrative burdens. By strengthening competition culture, our aim is to ensure that competition-compliant and law-abiding conduct becomes the norm as widely as possible. In 2020, we updated our guidance materials on green marketing, and in 2022 on influencer marketing. Their purpose is to present avoidable and recommended practices in an easily understandable way, using practical examples. In ad-

dition, the GVH regularly formulates recommendations for undertakings based on the findings of its market studies. Examples include the accelerated sector inquiries conducted in 2022 in the markets for COVID-19 antigen and antibody rapid tests, the accelerated sector inquiry into the food industry in 2023, and the recommendations stemming from the artificial intelligence market analysis in 2024.

We also assist undertakings that are willing and committed to cooperate during proceedings. Cooperation with the national competition authority enables undertakings to better understand the shortcomings of their unlawful practices and, not least, may result in significant reductions in fines, as well as the mitigation – or even avoidance – of other legal consequences (including criminal law and public procurement law implications). Thanks to leniency policy, settlement procedures and other forms of cooperation, over the past nearly six years companies cooperating with the GVH benefited from approximately HUF 21 billion (approx. EUR 54.489 million) in fine reductions. This amount remained in the national economy and contributed to preserving jobs and economic performance. By way of comparison, this represents more than 51% of the total amount of fines imposed during the same period.

Finally, our classic competition culture-development activities should also be noted. Through more than 600 press releases, we informed the public – including businesses – about the latest procedural and competition law developments. We held the Hungarian Competition Law Forum several times and launched new conference series promote corporate compliance and lawful conduct, such as the Hungarian Compliance Academy and, in consumer protection, the Digital Awareness Programme.

In the spirit of competition culture development, in 2022, we also launched a new book series under the title Competition Mirror (Versenytükör). Through the annually published thematic volumes, our objective is to strengthen dialogue among the regulatory, market, and academic communities of competition policy and consumer protection. To date, four thematic volumes have been published as part of this series.

Relentless enforcement against cartels

It must be stated, however, that cooperation is not always possible, and the national competition authority acts with full strictness in the interest of consumers and market competition whenever warranted. The GVH has always taken uncompromising action against hardcore anticompetitive agreements, as cartels – particularly those affecting public procurement –

constitute the most serious infringements of competition law. Strict enforcement also serves the interest of businesses that compete fairly and comply with the law. Over the past nearly six years, we dismantled a total of 27 anticompetitive agreements, imposing more than HUF 25 billion (approx. EUR 64.868 million) in competition fines. The most significant cartel case of the period was the artificial fertiliser market cartel case closed in 2021, resulting in slightly more than HUF 14 billion (approx. EUR 36.326 million) in fines. Although the Hungarian supreme court's, the Curia's judgment requires us to repeat the procedure, the court did not dispute the fact of price fixing, so we will not allow cartelists to evade responsibility. In addition to the artificial fertiliser cartel, in 2021 we uncovered a cartel allocating procurements of neuromodulation devices, which concluded with total fines of HUF 658 million (approx. EUR 1.707 million). We also dismantled, among others, a cartel involving collusion in public procurement procedures linked to a European Union healthcare project (approximately HUF 1.4 billion (approx. EUR 3.633 million). In December 2024, the Competition Council of the GVH imposed total fines of HUF 1.2 billion (approx. EUR 3.114 million) in a railway cartel case in the East-Hungarian (Debrecen) area. Most recently, at the end of 2025, we took decisive action against unlawful conduct in public procurement procedures for refuse collection vehicles and sewer-cleaning vehicles, imposing competition fines totalling nearly HUF 1.3 billion (approx. EUR 3.373 million).

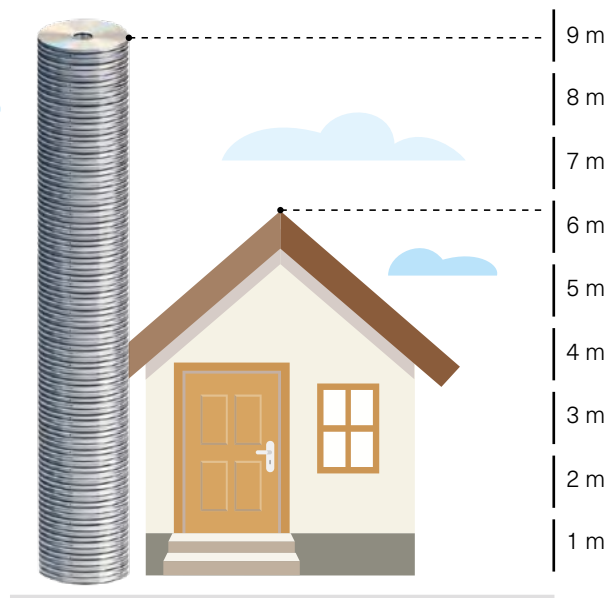


Digital transition

In recent years, a clear and consistent trend has become evident: the vast majority of business activities – and consequently, a large share of infringements – now occur within the digital environment. Beyond online communication and messaging, the proliferation of cloud-based services, the rapid expansion of e-commerce, and the growing dominance of social media platforms all reinforce this transformation. As a result, public authorities must increasingly direct their attention to the digital dimension of their work. Over the past six years, the GVH has pursued this objective with deliberate and sustained focus.

IT related challenges in cartel cases

Today, during on-site inspections conducted in cartel investigations, the national competition authority rarely encounters direct, paper-based evidence. Although a higher volume of physical documents is still seized during dawn raids carried out in the context of accelerated sector inquiries, the trend toward digitalisation is evident in these proceedings as well. Unlawful communications between undertakings are overwhelmingly electronic, which is why the



GVH primarily focuses on creating digital copies from electronic storage media. Depending on the case, this volume of data can be substantial. For instance, during one on-site inspection carried out in 2025, targeted tools were used to seize e-mail and chat data amounting to roughly 600 GB. Since April 2020, my colleagues have collected approximately 33.9 TB of data during dawn raids – data that subsequently had to be reviewed, processed (filtered and categorised), and analysed. To put this figure into perspective, it corresponds to about 3 400 high-definition feature films of average length, or more than 7 200

single-layer, single-sided DVDs. Stacked on top of one another, those DVDs would reach a height of approximately 8.7 metres.

To reduce this significant “data burden”, the GVH continuously develops the digital data-copying tools used during on-site inspections. While the originally predominant method of creating physical mirror images resulted in the seizure of a large amount of data irrelevant to the case, newer and more advanced techniques allow for far more targeted data seizure, thereby reducing the volume of data to be processed and optimising our resources.

Consumer protection in the era of digital giants

Consumer protection clearly demonstrates the pervasive shift toward fully digitised markets. The overwhelming majority of cases initiated by the GVH for unfair commercial practices now involve either the operations of digital marketplaces, social media platforms, or other online platforms, or the digital advertising activities of traditional (“non-digital”) companies. In response to these evolving challenges too, the authority has adopted a proactive approach. In recent years, the GVH has conducted several comprehensive rapid assessments targeting areas such as

green advertising claims, influencer marketing, and dark patterns in video games. These sweeps provide a swift yet detailed overview of specific practices in the online environment. They frequently reveal deficiencies or questionable conduct among online marketplaces and webshops. Accordingly, the GVH has initiated proceedings against undertakings including eMAG, Alza, CCC, and About You, while currently investigating certain practices of Temu.

A key part of the GVH’s consumer protection efforts in the digital environment involves enforcement actions against major technology companies. These “Big Tech” firms dominate markets through oligopolistic and monopolistic structures, wielding unparalleled influence over the broader economy. With such extensive influence comes correspondingly greater responsibility. Since 2018, the GVH has initiated proceedings against a total of 10 such companies. Notable outcomes include the 2020 TikTok investigation, which prompted the company to establish a global data centre for public information, implement default settings for users under 18, and voluntarily adopt a 20% cap on advertising. The GVH’s proceeding against Viber in 2024 resulted in enhanced transparency of its data processing notices, rendering the platform’s operations more accessible and comprehensible. In 2025, Microsoft committed to substan-

tial improvements in the Hungarian development of its artificial intelligence systems.

It should also be noted that – though not in every case – Big Tech companies are typically not inclined to cooperate with the national competition authority at first. This reluctance can extend to questioning the very legitimacy of an investigation, which complicates and may hinder the smooth conduct of enforcement proceedings.

The GVH is open to various forms of cooperation and frequently accepts binding commitments from undertakings instead of imposing fines, provided the societal benefits of such commitments substantially outweigh the value of potential fines. Such commit-

ments must be fully implemented by the parties involved, a requirement that my colleagues rigorously enforce through follow-up investigations. For instance, such follow-up investigations were carried out to monitor the implementation of the commitments by Tesco and LG, while within this framework, Booking.com was fined nearly HUF 400 million (approx. EUR 1.038 million) for partial non-compliance.

In proceedings against global technology companies, the GVH – whether substituting or supplementing fines – seeks to ensure that undertakings implement measures that safeguard the interests of Hungarian consumers and domestic businesses, protect Hungarian users, and provide them with dedicated support.

Closed competition supervision proceedings against Big Tech undertakings since 2018



Monitoring the practices of influencers

As digitalisation and the online environment have advanced, the role of influencers has grown significantly in importance over recent decades. On-line content creators have emerged as key drivers of brand-building and positive advertising, a trend that businesses have readily embraced. Nevertheless, influencers remain bound by applicable advertising regulations.

In autumn 2023, the GVH conducted a sweep of domestic influencers' marketing practices, which revealed that only 20% consistently comply with rules on disclosing advertising content. Drawing on these findings, the GVH has initiated – and continues to pursue – numerous proceedings against Hungarian influencers and their business partners.

In autumn 2025, at a professional conference organised by the GVH and the National Media and Infocommunications Authority (Nemzeti Média- és Hírközlési Hatóság, NMHH), the two authorities presented a comprehensive publication addressing influencer marketing practices alongside other key legal aspects of the topic.





AI - the new frontrunner of innovation

Looking back at the 2020s, one of the most defining topics will undoubtedly be artificial intelligence (AI). Although we have heard about its continuous development for many years, it is only in recent years that AI has moved beyond the academic sphere and truly entered the public consciousness as something of a crown jewel of the digital age. In doing so, it has not only upended the former rules of the technology sector but has also posed numerous challenges to the systems and enforcers of competition law and consumer protection.

Automation based on artificial intelligence raises issues such as who bears responsibility when an AI system commits an infringement while performing tasks automatically. Consider, for instance, an AI system that generates and publishes social media posts capable of misleading consumers. Another possible scenario is where two businesses rely on the same AI services provided by a developer which, in calculating optimal pricing practices – either at the companies' request or without their knowledge – uses the confidential internal data of both firms. This situation is not far removed from conduct that, under competition law practice, would qualify as unlawful price

coordination carried out through an intermediary. But who, in such cases, is truly responsible: the developer, the service provider, the purchasing companies, or the AI model itself?

Among the first to respond

At the national competition authority, we were quick to identify this trend – among other factors, due to the increasing prominence of artificial intelligence as a key element in a rising number of our proceedings. In the summer of 2023, we initiated a competition supervision proceeding against Microsoft, having identified deficiencies in the information provided regarding a specific AI-based function.

Recognizing that a comprehensive understanding of artificial intelligence – together with the identification of its implications for consumer protection and competition law – is essential for effective enforcement going forward, the authority initiated a market analysis of this technology's effects at the beginning of 2024, ranking among the first EU competition authorities to do so.

Artificial Intelligence: Trends and impact on the future markets



Through this analysis, the GVH established a comprehensive knowledge base that will constitute a key advantage in future proceedings, while also yielding several significant findings. We underscored that the adoption of this technology by small and medium-sized enterprises (SMEs) is essential to achieving its

broad economic and social benefits. However, this necessitates state support, as the development and deployment of AI require critical resources – such as extensive datasets, substantial computing capacity, and specialised expertise – that are predominantly controlled by Big Tech companies. Furthermore, the



training of equally essential professionals must be effectively coordinated at the national level.

We also highlighted another critical aspect: the challenges facing smaller languages, such as Hungarian, our native tongue. Companies developing large language models (LLMs) and AI services typically do not – or just barely – prioritise products tailored to the Hungarian market. This raises significant concerns regarding data sovereignty and cultural identity, while simultaneously exacerbating the competitive disadvantages faced by domestic SMEs.

Supporting the Hungarian AI ecosystem through competition enforcement

In parallel with the market analysis, we conducted a competition supervision proceeding examining the information practices associated with one of Microsoft's new AI-based functions. This procedure culminated in a commitment of historic significance. Under its terms, the undertaking will develop a database comprising 10 billion Hungarian word combinations – which, following appropriate preparation, will be incorporated into its LLMs – and will also make this database available to other developers, thereby facilitating enhancements to Hungarian-language capabilities across additional models.

By securing this commitment from one of the world's leading artificial intelligence companies, we are confident that it will drive a transformative advancement in the quality of Hungarian LLMs, thereby establishing a foundation for bolstering the domestic AI developer ecosystem and accelerating AI adoption among SMEs.

Joint efforts for progress

Drawing on the findings of our market analysis, we formulated several recommendations, including proposals to review the national AI strategy and enhance coordination of financial and strategic resources among state actors.

The Government of Hungary has since adopted a new Artificial Intelligence Strategy, whose direction aligns closely with the GVH's recommendations and approaches in several key respects. At the national competition authority, we remain committed to contributing to the domestic development of the AI ecosystem and supporting all initiatives that – while safeguarding consumer protection and upholding fair market competition – strengthen Hungary's innovation environment.



Unexpected challenges, new tools

Over the past five years – amid the COVID-19 pandemic, the energy crisis, and the Russo-Ukrainian war – the previous global order has been profoundly disrupted, with repercussion extending into the domain of competition law. This has given rise to rapidly emerging challenges on the horizons of both broader public policy and competition policy, necessitating innovative approaches and tools.

A new perspective amid challenges

Over the past nearly six years, one of my primary objectives has been to build – together with my colleagues – a Hungarian Competition Authority that is modern and renewed in every respect. This endeavour has encompassed not only more flexible merger control and the proactive deployment of digital solutions, but also the advancement of broader societal interests through traditional competition policy instruments, as well as innovative, unorthodox approaches.

From time to time, individual policy areas may fall into the trap of believing that they operate in a va-

cuum, where primarily the mandate and tasks of the given authority matter above all else. Competition authorities and competition policy itself are not immune to this problem, even though the reality is quite the opposite. Every public authority task must ultimately serve the interests of citizens, as public policy exists for people, not as an end in itself. In line with this approach and spirit, in recent years we have worked to create a more flexible GVH, capable of responding to a wider range of problems.

It was during the COVID-19 pandemic that the necessity became evident for our competition authority to step beyond traditional boundaries and, within our mandate, address challenges not conventionally aligned with competition law. Embracing these responsibilities, we conducted accelerated sector inquiries into the market for COVID-19 PCR rapid tests; our market-opening recommendations may have generated approximately HUF 5 billion (approx. EUR 12.974 million) in social benefits – without even mentioning the potentially saved human lives, the value of which is, of course, immeasurable.

We responded decisively in the inflationary environment triggered by the Russo-Ukrainian war. We scrutinised the markets for numerous food products and, based on our findings, issued targeted recommendations. The suspension of the Milk Product Council's raw milk base price forecast – proposed by the GVH – may have generated social benefits of approximately HUF 12 billion (approx. EUR 31.136 million) and substantially contributed to reducing average raw milk prices below the EU average. Furthermore, through collaboration with the Government, we launched the online Price Monitoring Database in summer 2023. This system mitigates information asymmetry between consumers and retailers, intensifies daily price competition in the retail sector, and helps contain food inflation. According to calculations by the Makronóm Institute, the system saved Hungarian households nearly HUF 20 billion (approx. EUR 51.894 million) during the winter months of 2023–2024 through its price-reducing effects.

The above examples clearly demonstrate that, with proper preparedness, non-traditional competition authority interventions can also be highly effective. I believe, we have refined these approaches; the next step is to deploy them across as many contexts as possible – and this is precisely what we intend to accomplish.

New tools for effective adaptation

The Hungarian Competition Authority benefited from the advantageous position wherein the legislator equipped it with an array of new tools to adeptly manage the emerging tasks and responsibilities stemming from these challenges, thereby establishing the foundation for effective enforcement.

In the examples above, I have already referred to the Price Monitoring Database and accelerated sector inquiries. It is important to emphasise that the Price Monitoring Database has undergone continuous development since its launch. In collaboration with the Government, we have enhanced it through multiple phases, both functionally and substantively. For instance, coverage has expanded from 62 product categories across 6 retailers at launch to price data for 5 000 products spanning 140 categories from 9 retailers, significantly amplifying the system's beneficial impact.

The GVH was granted authority to conduct accelerated sector inquiries in summer 2021. While traditional market investigation tools – such as sector inquiries and market analyses – were previously available, these often spanned extended periods and could last several years. The accelerated sector inquiry enables more agile and rapid responses to local-



sed market disruptions requiring urgent intervention, where delays of years for solutions are not feasible. Through this new form of investigation, we have been able to achieve positive changes in markets such as COVID-19 PCR rapid tests, construction materials, and retail food products. With its 30-day timeframe, the accelerated sector inquiry has become almost a *Hungarikum*.

In 2023, our toolkit was expanded to include warning the undertakings, enabling the President of the GVH to signal concerns to market players regarding potentially unlawful conduct prior to initiating a competition supervision proceeding. This early intervention facilitates the preventive and voluntary resolution of competition issues, fosters constructive dialogue between the authority and market participants, and optimises resource allocation. Since its introduction, 79 market players were warned, conserving resources that would otherwise have been expended on unnecessary formal proceedings.

In 2024, in order to enhance the effectiveness of the GVH's measures, the legislator conferred additional powers upon the authority. By authorising the blocking of access to data disseminated via electronic communications networks – such as websites – the GVH can now respond more swiftly and comprehen-

sively to consumer-endangering content. The significance of website blocking was underscored in the *Elf Bar* cases and proceedings against *Lottoland*, where certain companies declined to voluntarily remove their websites despite the authority's requests. Furthermore, the GVH's remit was broadened in 2024 through new competences to monitor compliance with fixed book pricing rules and to scrutinise unfair general terms and conditions imposed by accommodation intermediaries, thereby equipping us with enhanced tools to safeguard Hungarian consumers and accommodation providers more effectively.

Further expansion of the national competition authority's remit has been supported by EU Digital Markets Act (DMA) and the Foreign Subsidies Regulation (FSR), as well as by the EU regulation on digital services (DSA), the domestic application of which the GVH supports in close cooperation with the NMHH.

I believe that over the past nearly six years, the Hungarian Competition Authority has become a more prepared, flexible and responsive competition authority – both in terms of handling new challenges and in relation to its competences and powers. I extend my sincere thanks to the legislator and my colleagues for enabling these advancements.





International outreach

The GVH has a traditionally strong international network. The GVH consciously strives for international activities based on broad, mutual knowledge sharing and, to this end, plays an active role in international competition law and policy organisations.

When I assumed leadership of the GVH in April 2020, it was my explicit objective to further increase the GVH's activity and engagement at international level. I firmly believed that international activities based on extensive connectivity and active knowledge-sharing – while taking Hungary's foreign policy priorities into account – would be crucial to the success of our work.

Accordingly, over the past nearly six years we have actively represented Hungary and Hungarian competition policy interests in various bodies and working groups of the International Competition Network (ICN), the European Competition Network (ECN), and the Organisation for Economic Co-operation and Development (OECD), while also successfully operating the OECD–GVH Regional Centre for Competition in Budapest (RCC), which celebrated its 20th anniversary in 2025. In recent years, we have concluded several bilateral cooperation agreements (Montenegro, Türkiye, Azerbaijan, Greece, Georgia),

joined – as an observer state – the competition authority cooperation framework established among the member states of the Organization of Turkic States (OTS), and maintained active professional relations with the competition authorities of the Visegrád countries (V4) as well.

In 2021, Hungary – and the GVH – had the professional honour of hosting the ICN Annual Conference, which brings together competition authorities from around the world. Due to the COVID-19 pandemic, the conference was organised in an innovative way, becoming the world's first fully virtual ICN Annual Conference. One tradition of these global competition authority conferences is that the host country prepares a special professional project for the event. As the host for 2021, we chose the relationship between sustainable development and competition law as the theme of our special project. This work was the first to assess at a global level, environmental sustainability considerations in competition law enforcement among competition authorities and consulting firms, with particular focus on agreements restricting competition. **It is no exaggeration to say that in October 2021, Hungary became a central focal point of the global competition authority community.**

The GVH's international network:

European Competition Network (ECN): A cooperation framework bringing together the European Commission and the national competition authorities of EU Member States. The GVH is an active member of the ECN and holds a co-chair position in the Cooperation Issues and Due Process (CIDP) Working Group.

Organisation for Economic Co-operation and Development (OECD): GVH experts regularly contribute to OECD meetings, and for more than 20 years the GVH has jointly operated the GVH–OECD Regional Centre for Competition (RCC) in Budapest. From 2026, the President of the GVH will serve as one of the **Vice-Chairs of the Bureau of the OECD Competition Committee.**

International Competition Network (ICN): The GVH held a co-chair position in the Agency Effectiveness Working Group until 2025, and from summer 2025 in the Cartel Working Group. The President of the GVH is a **member of the ICN Steering Group.**

United Nations Conference on Trade and Development (UNCTAD): GVH experts regularly participate in the organisation's working groups dealing with competition law and consumer protection.

Cooperation of the competition authorities of the Organization of Turkic States (OTS): Joined as an observer member in 2024.

Visegrád Group (V4): Active cooperation with the competition authorities of the V4 countries to strengthen an expanding bilateral competition law network. In spring 2022, within the framework of the Hungarian V4 presidency, the GVH organised an international competition law conference.



Another major event was the **50th European Competition Day in 2024**, which we organised in close cooperation with the Government of Hungary. One of the key objectives of Hungary's EU Council Presidency was to promote enlargement. In this spirit, in addition to the 27 EU Member States, we invited the competition authorities of a further eight countries at various stages of EU accession to the European Competition Day. The main topics of the international event were competitiveness, the relationship between sustainability and competition policy, experiences with the application of the Digital Markets Act (DMA), and artificial intelligence. In November 2024, the attention of the European competition policy and competition law community was focused on Hungary.

It is a great honour for me personally and, above all, a recognition of the outstanding professional community of the GVH that in 2021, as the head of the competition authority hosting the ICN Annual Conference, **I became a member of the ICN Steering Group (ICN SG)**. This temporary membership became permanent in 2023, when I was elected to the body, which was reaffirmed at the ICN's 2025 Annual Conference in Edinburgh. Within the ICN Steering Group, I have the opportunity to sit at the same table as the heads of competition authorities from countries such as the USA, Australia, Germany, Egypt,

the United Kingdom, Japan, India, the Philippines, France, Italy, Spain, South Korea, Canada, Brazil, Singapore, Portugal, Mexico, South Africa and Kenya – representing Hungary and the domestic competition law priorities that serve the Hungarian people. From our region, only the President of the Hungarian Competition Authority is an elected member of the ICN's governing body.

It is a similarly great honour that **in December 2025, I was elected to the 17-member Council of the OECD Competition Committee, where I will serve as one of the Vice-Chairs**. This recognition is also a tribute to Hungary, Hungarian competition policy, Hungarian competition law experts, and the dedicated staff of the GVH.

In connection with this latter recognition, it is important to highlight **the Regional Centre for Competition (RCC) in Budapest established jointly by the GVH and the OECD in 2005**. The purpose of the Centre is to provide support – building on the professional background of the two institutions – to competition authorities in Central and Eastern Europe, South-Eastern Europe and Central Asia by organizing competition law training and other professional programs. There are currently three such training centres worldwide – one in Hungary, one in Peru and

one in the Republic of Korea – with a fourth centre set to begin operations in Saudi Arabia next year. The Budapest centre has 17 beneficiary countries.

In 2025, the Hungarian RCC celebrated the 20th anniversary of its establishment. During this period, it organised a total of 164 events, providing a platform for knowledge-sharing and experience exchange for approximately 6 600 experts. The OECD and the GVH marked the jubilee with a joint professional conference in February.

To further expand our international network, we have also strengthened cooperation with our Turkic and Far Eastern counterparts. We have concluded formal cooperation agreements with the Turkish and Azerbaijani competition authorities, and we have joined, as an observer, the cooperation framework of competition authorities of the member states of the Organization of Turkic States.

Over the past nearly six years, we have broadened our international network more than ever before and placed it on a foundation that explicitly serves Hungarian national competition law interests and rejects bloc-based approaches.

Beneficiary countries of the RCC



In defence of social values

Strengthening fair market competition and protecting consumers from harmful practices are policy objectives that are scientifically grounded and professionally substantiated, and whose importance is beyond dispute. Alongside these, however, we also keep in mind social values that transcend individual policy areas.

Vulnerable consumer groups

The GVH places a particular emphasis on safeguarding four groups of vulnerable consumers: the elderly, the sick, families and children. We have protected the elderly and the sick – groups that significantly overlap – through strict oversight of health-related claims, as well as through our investigations conducted during the COVID-19 pandemic and the recommendations formulated based on their findings. In the case of the elderly, it is important to highlight the scams and frauds linked to the secondary sale of vacation rights (timeshares), a problem that has persisted for decades. The GVH has been consistently fighting these practices and, as part of its competition advocacy activities, has also initiated amendments to the relevant legislation.

Family and child protection

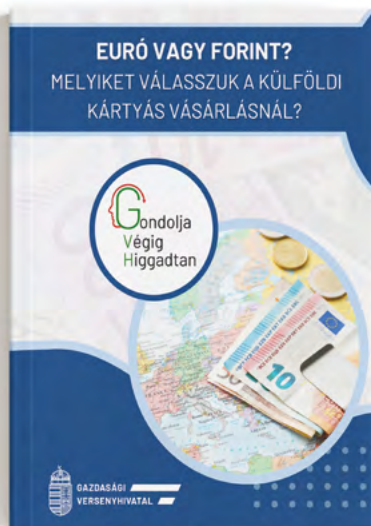
Among vulnerable consumer groups, we place particular emphasis on families and children. One of the explicit objectives of my presidency has been to ensure that the Hungarian Competition Authority becomes an even more family-friendly organisation, both in its enforcement activities and in its internal operations. In the course of our consumer protection cases, we have eliminated numerous misleading practices targeting children and parents, and based on our experience, we have also put forward proposals on several occasions. Perhaps the most significant of these was that, following our recommendation, the legislator amended Section 4 of the Unfair Commercial Practices Act (Fttv.) in 2022, thereby elevating family relationships and community ties to an explicitly protected statutory level. This provision has subsequently been applied in several of our cases. For example, in a case concluded in 2025, we put an end to misleading claims regarding the alleged medicinal effects of products marketed under the Babybeet brand, which were promoted specifically to families with young children.

From the perspective of child protection, our cases concerning Elf Bar products were also of particular importance, supported by professional cooperation within the framework of the coalition against Elf Bar. The GVH imposed a fine on three Slovak webshops a total of nearly HUF 300 million (approx. EUR 778 412) for falsely creating the impression that they were legally selling their products online.

In addition to the coalition against Elf Bar, we are active members of the Family Affairs Roundtable of the Ministry of Culture and Innovation, and since 2022 we have led the Family-Friendly Working Group, which I established to support the work of the Consumer Protection Roundtable.

Education for preparing future generations.

One of the most important elements of child protection is preventive education and preparation. To this end, in 2024 we relaunched our Think It Over Calmly educational campaign, through which we aim to draw the public's attention – in a clear and concise manner – to both common and less obvious risks. The campaign addressed issues targeting children and young people such as the risks of free mobile and computer games, potentially questionable influencer practices, and the safe and conscious use of mobile applications.





In parallel, at the beginning of 2024 we launched a much more direct, face-to-face educational programme called the Digital Awareness Programme. This programme aims to foster critical thinking and inquisitiveness in children from a young age and present them with the risks lurking in the digital space. Within this framework, colleagues of the GVH visit participating schools to deliver 45-minute interactive presentations. In autumn 2024, we also joined forces with the organisers of the Let's Teach for Hungary programme to further strengthen the initiative. To date, we have reached approximately 6 500 children with these important messages.

A family-friendly organisational culture

At the Hungarian Competition Authority, representing family values is a primary consideration not only in our enforcement activities, but also in shaping our internal organisational culture and measures. In recent years, we have introduced several benefits supporting child-rearing, including school-start allowances, health fund contributions, and an increase in the amount of childbirth support.

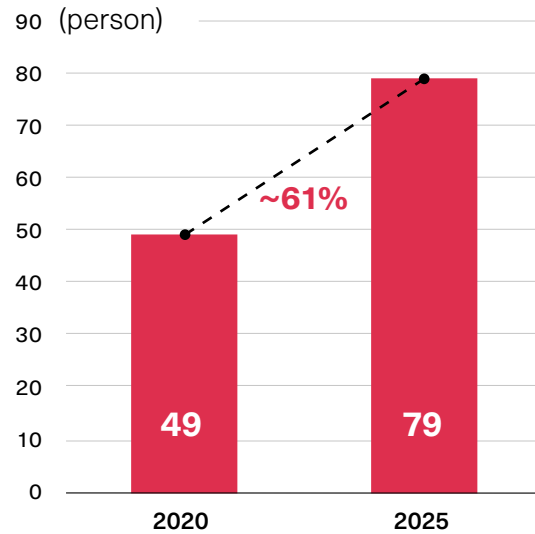
To support work-life balance, we provide the possibility of part-time employment to all employees, and in

2024 we also established a child-friendly workstation within the Authority's headquarters.

As a result of strengthening our family-friendly organisational culture, since 2020 there has been a significant increase in both the number of employees raising children under the age of 18 and the number of children being raised.

As recognition of these efforts, in 2024 we were awarded the Family-Friendly Place certification mark by

Number of employees raising children under the age of 18

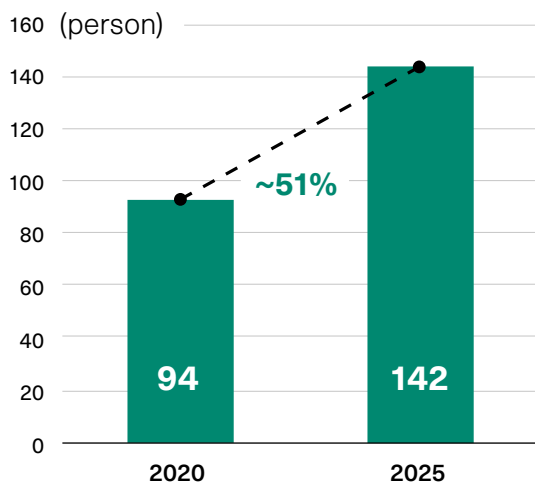


the Family-Friendly Hungary Centre, and in several years, we also received the Family-Friendly Workplace award from the Ministry of Culture and Innovation. I am particularly proud of these distinctions.

Social engagement

Beyond supporting social values and objectives through our professional work, colleagues of the national competition authority have also demonstrated their willingness to help on a personal level on numerous occasions.

Number of children under the age of 18 raised by GVH employees



In recent years, we have organised several charitable collections among our staff, all of which concluded successfully. Thanks to these initiatives, we have contributed, among other things, 22 schoolbags filled with supplies to the “CsodaTáska” (Magic Bag) campaign, supported the recovery of several seriously ill children, provided financial assistance for the care of children orphaned by the COVID-19 pandemic, and contributed to the equipment of the soup kitchen of the Nagyszőlős Social Charitable Centre, thereby helping our compatriots in Transcarpathia. Most recently, colleagues of the GVH provided financial support to victims of the natural disaster affecting the Parajd salt mine through the Hungarian Interchurch Aid. We also supported the organisation’s work at Christmas 2025, when the staff of the GVH collected HUF 1.2 million (approx. EUR 3 114), helping to make Christmas brighter for 120 children.

It is also worth highlighting that in 2020, we organised an in-house blood donation drive to help address the nationwide shortage of blood supplies caused by the COVID-19 pandemic. These organised blood donation events were continued in subsequent years. In the autumn of 2024, employees of the national competition authority also provided voluntary assistance in restoration work following flood emergency measures.



Closing remarks

To sum up my thoughts, there can only be one main goal for the coming years: to preserve the results achieved so far and to continue building and developing on the foundations that have been laid. The GVH's primary mission will always be the protection of consumers and market competition. There is no better recipe for achieving these goals than honest work committed to Hungarian national interests, coupled with proactive and continuously evolving law enforcement.

Artificial intelligence will unquestionably play a key role in the development of regulatory work in the coming years. Building on our existing knowledge base, the national competition authority is actively exploring which processes could benefit from AI's efficiency-enhancing capabilities in the future. In this context, we are already working on integrating this technology into the activities of the joint OECD-GVH RCC.

We will also place particular emphasis on the proper implementation and utilization of new tasks and competences. In this regard, I would highlight the

new possibility of designating undertakings of cross-market significance, through which the legislator has provided us with a modern tool already tested in European legal practice. We will apply this new legal framework in practice.

Finally, I would mention the issues surrounding the proposed European Union legislation on digital fairness, the Digital Fairness Act (DFA). I am convinced that consumer protection can only work effectively if it is sufficiently close to consumers and adapted to national specificities and needs. Accordingly, we will do everything possible to ensure that national competences remain with national authorities and institutions. We do not support the centralisation of consumer protection powers and their elevation to the EU level.

I can confidently say that Hungarian people, as well as law-abiding and cooperative undertakings, will continue to be able to rely on the Hungarian Competition Authority. The GVH stands on the side of the Hungarian people and Hungarian interests.





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