



MEMORANDUM OF UNDERSTANDING

IN THE FIELD OF

COMPETITION LAW ENFORCEMENT AND POLICY

BETWEEN

THE HUNGARIAN COMPETITION AUTHORITY

AND

THE HELLENIC COMPETITION COMMISSION

The Hungarian Competition Authority (“HCA”) and the Hellenic Competition Commission (“HCC”) (hereinafter referred to as “the Participants”),

Desiring to promote and strengthen a framework of voluntary cooperation, based on the principles of equality and mutual benefit, in the field of competition law enforcement and competition policy, including advocacy and proposed legislative changes,

Recognising the need for broader cooperation in order to enhance an environment in which the sound and effective enforcement of competition policy and law supports the sustainable development of market economy,

Aiming at the creation of favourable conditions for the development of bilateral relations,

Have reached the following understanding:

Article I. PURPOSE AND DEFINITIONS

1. The purpose of the present Memorandum of Understanding (“hereinafter referred to as the Memorandum”) is to facilitate and strengthen cooperation between the Participants in the field of competition law enforcement and competition policy.

2. In this Memorandum, these terms will have the following definitions:

(a) The terms “competition law” or “competition rules” mean, in addition to the competition rules of the European Union:

(i) for the Hungarian Competition Authority, Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices, as well as any amendments thereto and regulations made under it;

(ii) for the Hellenic Competition Commission, Law no. 3959/2011 “On Protection of Free Competition”, as well as any amendments thereto and regulations made under it;

(b) The term “enforcement activity (-ies)” means any investigation or proceeding conducted by each of the Participants in relation to the competition laws they enforce;

3. The terms defined above are to be understood in accordance with the Participants' respective mandate and legal framework, including under international and/or European Union law where relevant.

4. In applying the present Memorandum, the Participants will take account of the commitments arising from Hungary's and the Hellenic Republic's membership of the European Union.

Article II. AREAS OF COOPERATION

Subject to their laws, policies, and reasonably available resources, the Participants will promote cooperation as follows:

(a) exchanging information on legislative and policy developments of the respective States of the Participants in the field of competition law enforcement;

(b) exchanging views on policy developments relating to international fora in the field of competition law and enforcement, including the International Competition Network ("ICN"), the Organisation for Economic Co-operation and Development ("OECD") and the United Nations Conference on Trade and Development ("UNCTAD");

(c) sharing of technical expertise in the field of investigations regarding the violation of competition rules, provided that it does not affect any current investigation or proceedings being carried out by either Participant;

(d) exchanging experience in the field of competition advocacy, including the promotion of a competition culture through raising awareness of companies and the wider public about competition legislation and enforcement;

(e) providing information and methodological assistance in preparing proposals and drafting legal acts in the field of competition;

(f) organizing study visits and experience-sharing events, as conferences, seminars and other events organized by the Participants.

Article III. FORMS OF COOPERATION

1. The Participants may periodically hold, at the request of either Participant, meetings or consultations between designated Participant officials to facilitate cooperation within the areas outlined in Article II.

2. Cooperation between the Participants may take the following forms:

- (a) exchanging non-confidential information regarding competition policy and enforcement developments;
- (b) expert meetings or consultations, via e-mail, telephone or online communication platforms, between the Participants regarding exchange of non-confidential information on issues of mutual interest;
- (c) organising study visits and experience-sharing events;
- (d) high-level meetings and/or visits for the purposes of discussing the Participants' cooperation and joint activities as well as reviewing the work plan of the overall partnership;
- (e) joint organisation of and/or participation in international conferences, seminars, workshops, symposia or other events;
- (f) joint participation in research or policy projects, including collaboration with academic institutes or policy institutions or other organisations;
- (g) joint production or commissioning of non-confidential documents in the field of competition law and policy, such as policy papers, briefs or technical reports;
- (h) exchanging non-confidential documents in the field of competition law and policy, such as regular publications by the Participants, including annual reports, studies, books, journals and information bulletins.

**Article IV.
EXCHANGE OF INFORMATION**

The transmission of information will be in English in writing, through designated general contact points or on the occasion of Participants' representatives' meetings.

**Article V.
CONFIDENTIAL INFORMATION**

1. No Participant will be obliged to provide or communicate information to the other Participant if the provision/communication of such information is prohibited by the law the laws or policies governing the Participant possessing the information or would be incompatible with that Participant's interest.

2. Insofar as information is communicated, the recipient should, to the extent consistent with its laws:

- a. maintain the confidentiality of any such information communicated to it;
- b. adhere to any conditions the Participant who provides the information imposes; and
- c. seek written consent from the Participant who provides the information to any release or disclosure of the information.

3. The Participant will notify each other in writing of any unauthorized misappropriation, disclosure or use by any person of the confidential information and shall take all steps reasonably requested to limit and stop such disclosure.

Article VI. ORGANISATION OF ACTIVITIES

1. The agenda, place and other elements of activities, including financial aspects, will be individually established by the Participants by mutual agreement.

2. Each Participant will bear its own expenses with regard to the implementation of this Memorandum, unless otherwise agreed by the Participants.

Article VII. DISPUTE RESOLUTION

Any dispute regarding the scope, interpretation and application of the present Memorandum, if any, will be resolved amicably through consultations and negotiations between the Participants.

Article VIII. REVIEW AND AMENDMENTS

Any review or amendment to the Memorandum will be made by mutual written agreement of the Participants and will be an integral part of the present Memorandum.

Article IX. FINAL PROVISIONS

1. The Memorandum is concluded with a view to enhancing and developing cooperation between the Participants and nothing in it is intended to change existing laws, policies, agreements or treaties. This Memorandum is not an international treaty and does not create rights and obligations under international law.

2. The Memorandum does not oblige the Participants to commit resources in terms of funds, time, staff or other administrative resources.

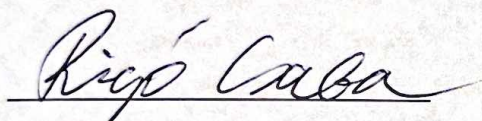
3. The Memorandum will come into effect on the date of its signature and is concluded for an unlimited period of time.

4. Either Participant may terminate this Memorandum. The termination will take effect three (3) months from the date of receipt by either Participant of a written notification to the other Participant stating its intention to terminate the present Memorandum.

Signed in Athens, on 20 October, 2025 in duplicate in English language, both texts being equally authentic.

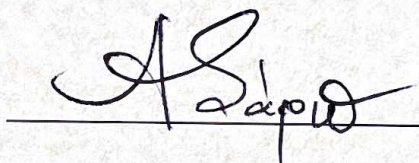
For the Hungarian Competition Authority

For the Hellenic Competition Commission



Csaba Balázs RIGÓ

President



Irene SHARPE

President