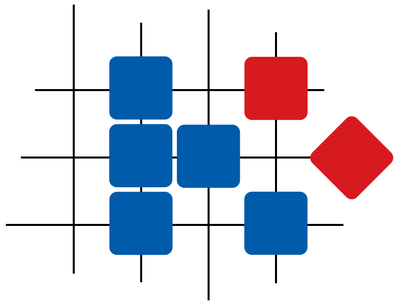


HAKOM 2025
ANNUAL ACTIVITY REPORT

ZAGREB, MAY 2026

HAKOM



Pursuant to the Electronic Communications Act, the Croatian Regulatory Agency for Network Industries (HAKOM), hereby submits to the Croatian Parliament and the Government of the Republic of Croatia its Annual Activity Report for the year 2025. The financial statements and final statement are integral parts of this Report.

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1

INTRODUCTION





Council of HAKOM: Marko Jukić, Mislav Hebel, Tonko Obuljen, Nikola Popović, Ante Milas

1.1 PREFACE

In 2025, the Croatian Regulatory Agency for Network Industries (HAKOM) continued to perform its regulatory, supervisory and developmental tasks in the fields of electronic communications and postal and rail services, in accordance with the Annual Work Programme.

HAKOM's work focused on preserving a stable, transparent and predictable regulatory framework and on carrying out tasks that ensure the conditions for the efficient functioning of the market, the availability and quality of services and the protection of the rights of users and passengers. The achievement of these objectives took place in the context of the further development of the market for network industries and the continuation of structural changes in individual sectors, which required a continuous adaptation of regulatory activities within the scope of the Agency's statutory competence.

In the field of electronic communications, activities provided for in the Work Programme were conducted to monitor the development of the infrastructure and services, including the further construction of very high capacity networks and next generation mobile networks, while ensuring regulatory preconditions for competition and user protection. In the postal services market, regulatory activities focused on monitoring the adaptation of the market to technological and social changes, while particular attention was paid to the availability and quality of universal service. In the railway sector, the Agency's activities took place in the circumstances characterised by infrastructure interventions and capacity constraints, with a regulatory focus on ensuring non-discriminatory access to the infrastructure and protecting passenger rights.

The protection of users and passengers, market transparency and ensuring an elevated level of quality and availability of services were horizontal objectives that were implemented in all areas of HAKOM's work. Attention was paid to vulnerable groups and the accessibility of services, in line with the strategic objectives set out in the Annual Work Programme.

In the area of radio frequency spectrum management, responsible and efficient management of this limited national resource continued, with monitoring activities, infrastructure development, and technical capacity building. As the Broadband Competence Office, in 2025 the Agency continued to monitor the implementation of broadband infrastructure development projects and participate in European initiatives aimed at strengthening digital connectivity. At the same time, in its role as the national Digital Services Coordinator, it continued to develop the institutional and operational prerequisites for the implementation of the Digital Services Act, in cooperation with competent national and European authorities.

The Council of HAKOM regularly monitored the implementation of the Annual Work Programme for 2025 and of HAKOM's key regulatory activities, acting within its legal powers and taking account of public interest, regulatory independence and work transparency. This Annual Report provides below a detailed overview of the outputs of planned activities, broken down by individual work areas in 2025.

Council of HAKOM



Miran Gosta, Executive Director

1.2 CONTEXT

HAKOM's dynamic regulatory and market environment is characterized by rapid technological changes, new European regulations, and growing expectations of service users. The development of infrastructure based on VHCN networks (very high capacity networks), the growing importance of cybersecurity and the increasing requirements for quality, accessibility and transparency of services in the postal, rail, electronic communications and digital services sectors had a particular impact on HAKOM's work in 2025. The business environment was further affected by inflationary pressures, rising operating costs and operator investment cycles.

Last year was the final year of implementation of the HAKOM Strategy for the period from 2022 to 2025 and the organisation needed to be prepared for a new strategic period. The new HAKOM Strategy for the period from 2026 to 2028 was developed, which in terms of organization emphasizes the strengthening of operational capabilities, more efficient management of business processes and the development of organizational and professional capacities necessary for the performance of HAKOM's expanded competences. In 2025, a new Digital Services Sector was established within HAKOM to conduct the tasks arising from the Digital Services Act (DSA) and the Act on the Implementation of Regulation on a Single Market for Digital Services.

In parallel with organizational adjustments, systematic work continued on the improvement of business processes, business digitalisation and quality management as well as the development of analytical systems and employee competencies. At the end of 2025, HAKOM employed a total of 190 employees, mostly highly qualified, with a significant part of the employees having many years of professional experience, which represents a solid foundation for the continuity and stability of the Agency's work. In such circumstances, HAKOM maintained the continuity of work, performing regulatory, supervisory, coordination and analytical activities, conducting administrative procedures and managing the RF spectrum, addresses and numbers, all to ensure effective competition, infrastructure development and user protection in regulated sectors.

Table 1. Structure of HAKOM's employees

		Qualification structure (%)				Gender (%)		Age structure (%)				
	Number of employees as at 31 December	University degree PhD, MSc	University degree	Two-year degree	Secondary school qualifications	Men	Women	18-30	31-40	41-50	51-60	60+
HAKOM	190	12.63%	63.16%	12.63%	11.58%	47.89%	52.11%	2.63%	8.42%	51.05%	35.26%	2.63%

The implementation of certain activities was further influenced by intensive cooperation with domestic and European institutions, the requirements of market stakeholders and the need to harmonise technical, legal and economic aspects of regulatory decisions.

Being aware that the regulatory environment, markets and technologies are constantly changing, we know that we are obliged to continuously develop an organization for the timely and responsible performance of all public powers entrusted to us.

Miran Gosta

2

SUMMARY



ELECTRONIC COMMUNICATIONS

The electronic communications market in the Republic of Croatia (HR) was in 2025 marked by stable revenue growth, a strong investment cycle and the continued technological transition to VHCNs. The sector's total revenues came close to EUR 2bn, growing annually by about 4 percent, whereas operator investments increased more than 23 percent. Such developments confirm the stability of the market and the continuity of investments in the development of network infrastructure.

The development of broadband networks, in particular optical fibre and 5G networks, remains in momentum. The number of optical fibre connections increased by almost 34 percent, and optical fibre access for the first time significantly approached the copper infrastructure, with the expectation that it will become the dominant form of fixed broadband access in 2026. At the same time, there is a strong growth of very high speed users, with more than 40 percent of connections having contracted speeds above 300 Mbit/s. Mobile networks continued to grow in terms of the number of users and data traffic, with a further expansion of 5G coverage, including in rural areas.

Internet service revenues accounted for almost half of total market revenues, while the long-term decline in fixed voice services continued. Pay-TV recorded a moderate growth in the number of users and revenues, with a considerable strengthening of operators' own OTT services.

The quality and availability of services in 2025 were assessed as stable and comparable to the ones provided in the previous period. No breaches of the principle of net neutrality were reported, and measurement tools and user experience surveys confirmed a high level of availability and satisfactory quality of online services. The security of electronic communications networks remained at a satisfactory level, without major incidents, while operators continued to align with the new cybersecurity framework.

POSTAL SERVICES

Postal services continue to play an important role in the economic and social connectivity of the HR, as a support to the development of ecommerce and reliable physical distribution of parcels. The postal services market was in 2025 marked by a continuation of long-term structural changes, with digitalisation and changes in user habits leading to a decrease in traditional letter correspondence, but at the same time encouraging strong growth in package and other value-added services.

Total market revenues in 2025 amounted to about EUR 406m, which is an increase of 11.5 percent from the previous year. After several years of decline, there was also a slight increase in the total number of postal services, which reached 261.7 million, primarily due to the growth of parcel services and printed matter.

At the end of 2025, 24 postal service providers were active on the market. Hrvatska pošta d.d. (HP) maintained its status as the sole universal postal service provider and its dominant market role, although its share in the total volume and revenues is gradually decreasing. Other providers recorded faster growth, particularly in the segment of other postal services, which became the main source of volume and revenue. The total number of employees in the sector increased by about 4 percent, with the further development of a network of parcel lockers and alternative pick-up or delivery locations.

The volume of universal postal service continued to drop, with the result that its share in the total number of services reached a historical low, despite the growth of revenues boosted by price adjustments. The quality of universal service in domestic traffic meets all the prescribed criteria, while in international traffic there are still challenges in terms of delivery deadlines, which is a trend also present at the level of the European Union (EU).

RAIL SERVICES

In 2025, the rail services market operated under circumstances marked by extensive infrastructure work on the rail network and structural capacity constraints. The low share of multi-track and electrified railway lines is a constraint and increases the vulnerability of traffic to disruptions and delays. At the same time, the implementation of infrastructure projects is a prerequisite for the long-term improvement of the reliability and competitiveness of railway traffic.

Passenger rail transport continued its growth trend. The number of transported passengers and passenger kilometres travelled increased by about 7 percent compared to the previous year, to 26.4 million passengers, primarily because of public policy measures aimed at increasing the availability of public transportation. In contrast, rail freight transport recorded a decline in activity and less goods transported (12.4 million tonnes). The 14.6 percent decrease in total goods transported and the 8.6 percent drop in tonne-kilometres carried are linked to economic conditions and frequent track closures for maintenance. This further complicated the planning and execution of transport.

The management of rail infrastructure and service facilities, where HŽ Infrastruktura d.o.o. (HŽI) provides the bulk of the services, continues to play a central role in the market. Charges for the use of infrastructure and associated services continued to rise, primarily due to increased labour and traffic management costs. The majority of the infrastructure manager's revenue is still secured

from public funds. The quality of rail services is strongly influenced by infrastructure constraints. Market monitoring was focused on ensuring transparent and non-discriminatory conditions for access to infrastructure and service facilities, as well as on the charges methodologies.

USER PROTECTION

The protection of users and passengers is one of the key regulatory areas of HAKOM. The related activities were aimed at ensuring a high level of user rights, market transparency and service accessibility, along with monitoring quality, handling disputes and complaints, and strengthening public awareness. Special emphasis was placed on the protection of vulnerable groups and persons with disabilities, so that the year 2025 saw the establishment of advisory mechanisms for children, the elderly and persons with disabilities in electronic communications. The protection of the rights of persons with disabilities is a horizontal theme promoted across all sectors. The annual project to increase and promote accessibility was successfully completed, carried out jointly with the Faculty of Electrical Engineering and Computing of the University of Zagreb (FER) and interested associations of persons with disabilities.

In the field of electronic communications, the focus of end user protection was on monitoring contractual relationships, price transparency and terms of service use, and on the effective resolution of user complaints raised with operators and disputes at HAKOM.

In the postal services market, consumer protection was, in addition to resolving disputes between consumers and providers, linked to monitoring the quality of the universal postal service and handling consumer complaints. Increased attention was paid to delivery deadlines, price transparency and network availability.

Passenger protection in rail transport primarily focused on analysing and resolving complaints, addressing challenges related to train delays, and ensuring the transparency of information that must be available to passengers.

RF SPECTRUM MANAGEMENT

Radiofrequency (RF) spectrum management, as one of the fundamental horizontal regulatory tasks, was carried out in accordance with the national legislation and international obligations of the HR, while upholding the principle of efficiency.

The deployment of radiocommunication infrastructure continued, particularly in the fourth and fifth generation network segment, which contributed to increased coverage and quality of mobile communications. In the field of microwave links, there was further growth in total transmission capacity, due primarily to the increased demands of mobile communications networks and in the context of 5G network development.

Broadcast networks retained their key role. Analogue FM radio remained dominant in radio broadcasting, while DAB+ digital radio figured as a technology platform with potential for further development. The transition to the DVB-T2 system with HEVC encoding in HD quality was completed in the field of digital terrestrial television, thereby improving spectrum efficiency and service quality for users.

The control and monitoring of the radiofrequency spectrum were in 2025 conducted using a system of control and measurement stations and field measurements. All planned measurement campaigns were carried out successfully, including interference monitoring, electromagnetic field measurements and checks of the compliance of radio systems' operation. Attention was paid to resolving domestic and international interference, especially in the coastal area.

BCO

In the Republic of Croatia, HAKOM performs the tasks of the Broadband Competence Office – BCO, aiming to promote the development of broadband access, particularly in the areas where there is insufficient commercial interest in investment.

As part of the National Framework Programme (NFP), the monitoring of 20 broadband infrastructure development projects for more than 140,000 households, completed in 2024, continued throughout 2025. The usage of the built networks was monitored, and moderate initial user interest was recorded, which is in line with expectations for the first year of use.

Under the National Recovery and Resilience Plan (NRRP), the implementation of projects comprised by Broadband Infrastructure Development Plans (BIDPs) from the second round of funding continued. After part of the contracts was terminated due to delays in implementation, only a limited number of projects remain to be realised.

During 2025, the BCO also participated in the implementation of the Connecting Europe Facility – Digital component (CEF Digital), including acting as the national contact point and verifying security guarantees. Two projects with Croatian partners were selected for co-financing, with implementation set to begin in 2026.

DSA

The Digital Services Act (DSA) has established a single EU regulatory framework for digital services. Its aim is to create a safer, more transparent and more responsible digital environment, while protecting users and strengthening trust in the single digital market. In the HR, the role of the national Digital Services Coordinator is held by HAKOM, which is responsible for overseeing the implementation of the DSA, coordinating with other competent authorities and cooperating with the European Commission, coordinators in other Member States and the European Digital Services Board.

In 2025, the role of the national coordinator was fully operationalised: the organisation was reorganised by establishing the Digital Services Sector, operational tools were developed, including the e-Provider DSA system, and cooperation with national and European institutions was strengthened.

The coordinating role involved the intensification of cooperation with other competent authorities in the HR and with coordinators in other Member States. HAKOM also regularly participated in the work of European working groups and carried out activities to preserve the integrity of the digital environment. At the same time, HAKOM prepared for the implementation of the regulatory framework in the HR by drafting secondary legislation. An Annual Report on the Implementation of the DSA was also prepared and published and submitted to the European Commission and the European Bord for Digital Services.

HAKOM'S OTHER ACTIVITIES

All other planned HAKOM's activities, such as those related to international cooperation, regulatory impact assessments, transparency of work, inspection supervisions, legal proceedings as well as organisational development and business digitalisation were carried out. Emphasis was placed on work within the framework of the European networks of regulators and European Union bodies: the BEREC, ERGP, IRG-Rail, Digital Services Committee within the scope of the implementation of the DSA, and EC committees and expert groups.

In the area of regulatory impact assessment, two planned analyses were carried out relating to the electronic communications market and one to the universal service in the postal market, with the continued improvement of the assessment methodology for future procedures. Transparency of work was ensured by the regular publication of decisions, acts and press releases, conducting public consultations for significant decisions and regularly updating the website.

Inspection supervision activities included inspection supervisions in the areas of electronic communications, the radiofrequency spectrum and postal and rail services aimed at monitoring the implementation of HAKOM's decisions and sectoral regulations, and protecting users and passengers. The inspection supervisions showed that in a significant number of cases the prescribed obligations were complied with, while in a smaller number of cases irregularities were identified and rectified through the enforcement of measures.

As part of the organisation's developmental activities, measures were implemented to improve business processes, systems and quality management, develop employees' competencies and digitalise operations. In 2025, particular attention was paid to strengthening cybersecurity within HAKOM.

FINANCIAL STATEMENT

In 2025, revenues totalled EUR 17,032,668.67 and were largely generated by radiofrequency spectrum management fees and fees for the performance of HAKOM's other activities in the electronic communications area. The increase in revenues from the previous period was influenced by the rise in annual gross revenues generated in the previous calendar year by operators of electronic communications networks and services, postal services providers and rail services provided by the infrastructure manager. In addition, there was a rise in fees for HAKOM's activities in the area of rail market regulation and a higher collection of fees for the use of the radiofrequency spectrum for the public electronic communications network was also achieved.

In 2025, expenditures were recorded at EUR 15,588,610.41 and used for the performance of HAKOM's own activities and its development. Employee expenses and material expenses accounted for the largest shares in HAKOM's total expenditures. The most significant material expenses relate to expenditure for services, within which the most prominent are rents and leases, expenses for intellectual and personal services, computer services, current and investment maintenance services, and other services.

As revenues exceeded expenditures in 2025, a surplus of current-year revenues was recorded, which resulted in an increase in the surplus carried forward from previous years.

3

ELECTRONIC COMMUNICATIONS



3.1 MARKET OVERVIEW

In 2025, the electronic communications market in the Republic of Croatia was characterised by stable revenue growth, increased operator investments and the continuation of the technological transition towards very high capacity networks. Emphasis continued to be placed on the development of broadband networks, especially optical fibre and 5G networks, which is reflected in the growing number of users and an increase in household coverage. At the same time, long-term structural trends are continuing, including the gradual decline in the use of traditional fixed line telephone services and the strengthening of internet access and data services. This chapter gives an overview of basic market indicators, revenue and investment developments, the market structure and the network infrastructure development in 2025.

Basic market indicators

In 2025, total revenues in the electronic communications market amounted to EUR 1.96bn, which is an increase of 4 per cent from the previous year. Operator investments reached EUR 526m, increasing 23.2 percent, while the number of employees grew 7.7 percent. These indicators point to a continuation of investment activity and stable sector performance.

Growth was also recorded in the number of users of both fixed and mobile access networks, as well as in the number of M2M connections, while the number of fixed line telephone service users continued to decline, which is in line with long-term trends of substituting traditional voice services with data-based communications.

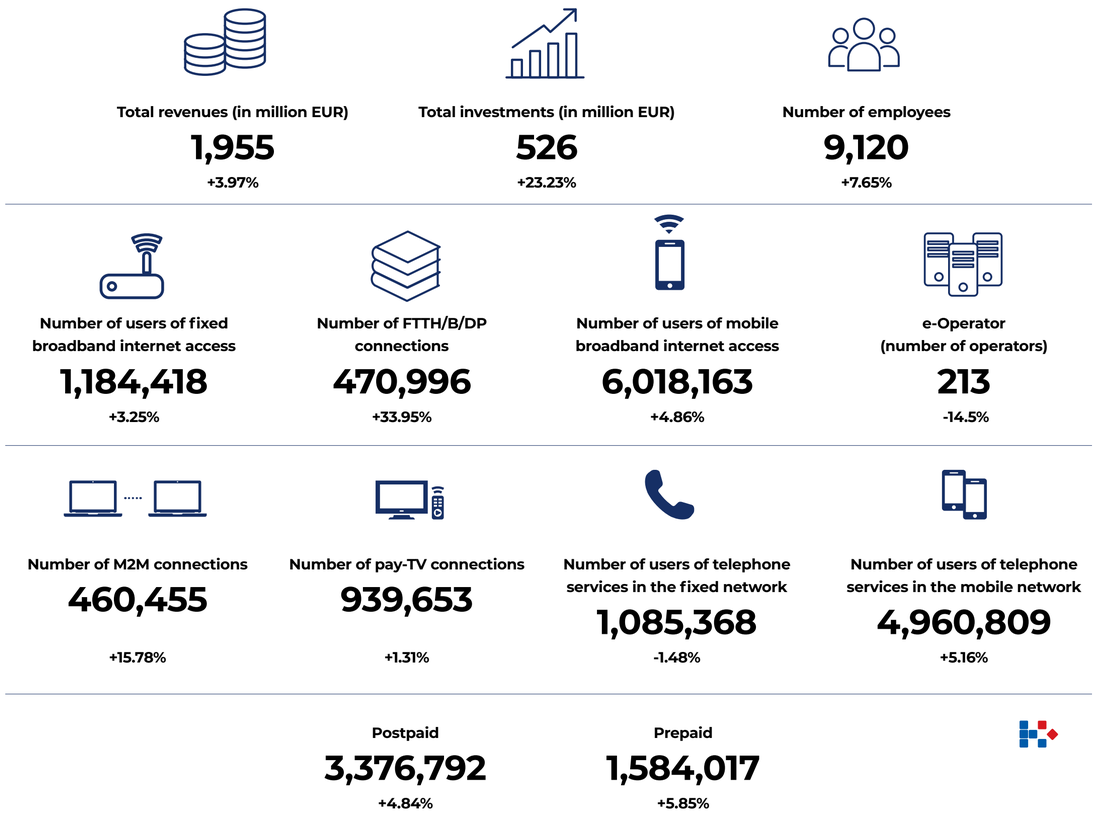


Figure 1 Overview of the electronic communications market

Market structure and service providers

The year 2025 saw 23 new notifications of the start of the provision of services and 59 notifications of the completion of activities submitted through the digitalised e-Operator system. At the end of the year, 213 operators were registered in the system.

The largest number of registered operators operate in the field of fixed internet access services, data transmission services and numeration-based services, while a smaller number of operators are engaged in specialised activities such as communications services on board ships and aircraft.

Revenues

The total revenues of the electronic communications market continued to grow in 2025, reaching EUR 1.96bn. The bulk of the revenues came from internet access services, accounting for almost a half of the total. Particularly noteworthy are revenues from the mobile internet access service, as they experienced continuous growth and represented the most significant segment of the total revenues of the electronic communications market.

Revenues from fixed voice services continued the long-term decline trend, while revenues from pay-TV and infrastructure leasing services showed a positive growth trend.

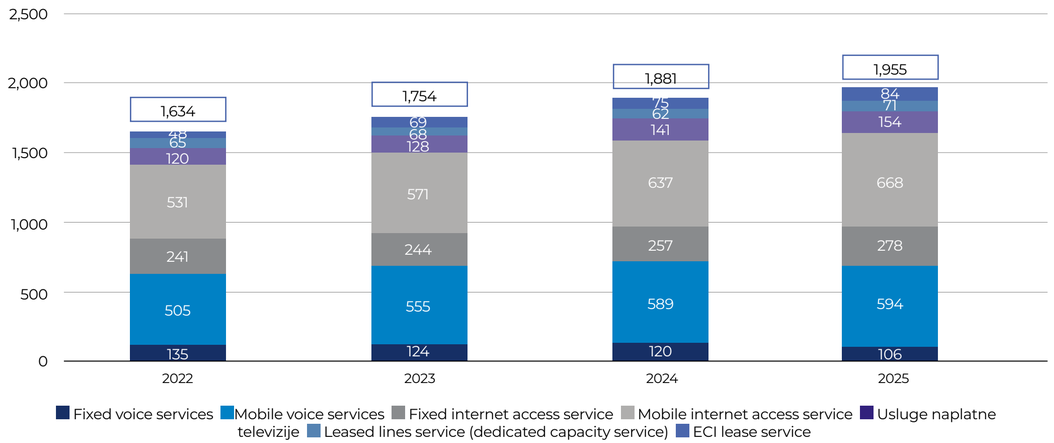


Figure 2 Total revenues of the electronic communications market (in EUR million)

If revenues from the leasing of the electronic communications infrastructure (ECI) are excluded from the analysis, revenues from services provided via mobile networks accounted for around 67 per cent of the market's total revenues. In terms of market share by revenue, the largest share is still held by Hrvatski telekom d.d. (HT), both in fixed and mobile network markets. If revenues from the leasing of electronic communications infrastructure (ECI) are excluded from the analysis, revenues from services provided via mobile networks account for around 67 per cent of the market's total revenues. In terms of market share by revenue, the largest share is still held by Hrvatski telekom d.d. (HT), both in the fixed and mobile network markets.

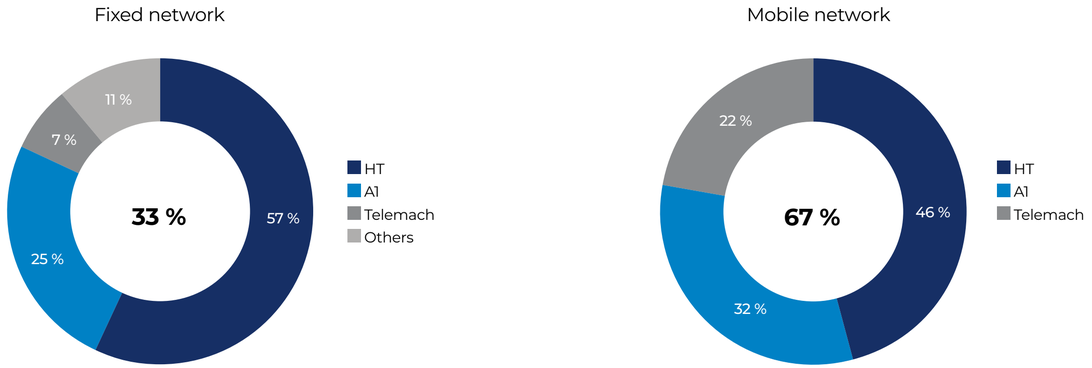
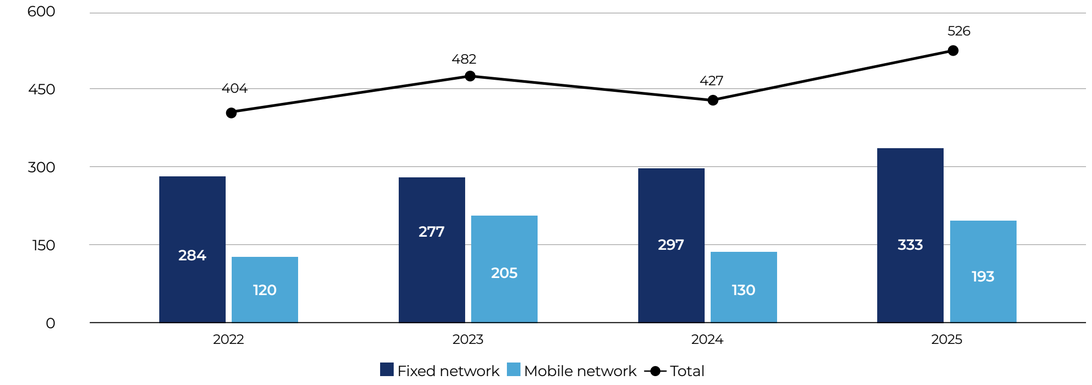


Figure 3 Revenue shares of networks and operators in 2025

Investments

In 2025, total investments by electronic communications operators reached their highest level in the last four years, standing at EUR 526m, which is an increase of EUR 99m from the previous year. With investments in the radiofrequency spectrum excluded[1], investment growth was primarily fuelled by an increase in investments in fixed networks, in particular in the optical fibre infrastructure.



1 Operators report investments in the radiofrequency spectrum depending on the dynamics of spectrum allocation and investment cycles and, in accordance with their internal accounting policies, may report them as a single item or spread them over multiple accounting periods. Some operators record paid RF spectrum fees as capital expenditures (CAPEX) and some as operating expense (OPEX).

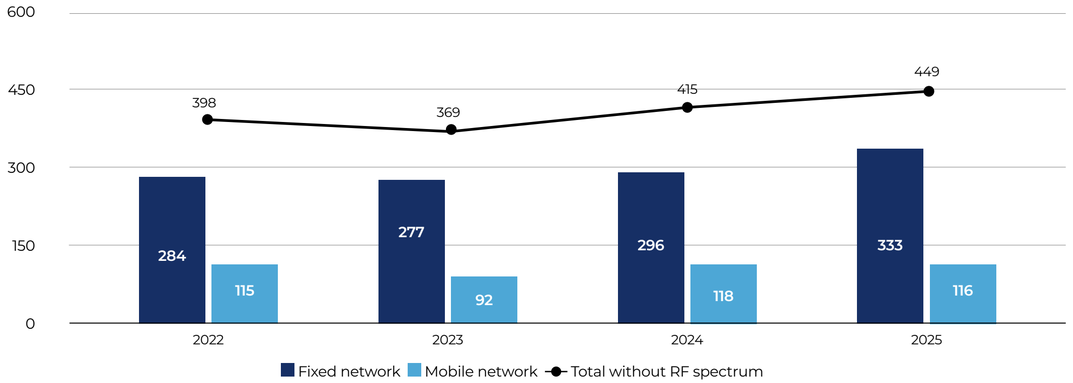


Figure 4 Total investments by electronic communications operators in the HR (in EUR million)

Very high capacity networks and coverage

In 2025, investments in very high capacity networks (VHCNs) continued to grow, increasing by almost EUR 20m compared to the previous year. Of the total EUR 135.7m invested in VHCNs, the largest share was accounted for by investments in optical fibre networks, while investments in cable networks continued to decline.

The increase in investments is reflected in the continuous growth of VHCN household coverage. Operators' commercial investments are focused on urban and densely populated areas, while rural areas have seen significant progress in coverage, although disparities compared with urban areas remain.

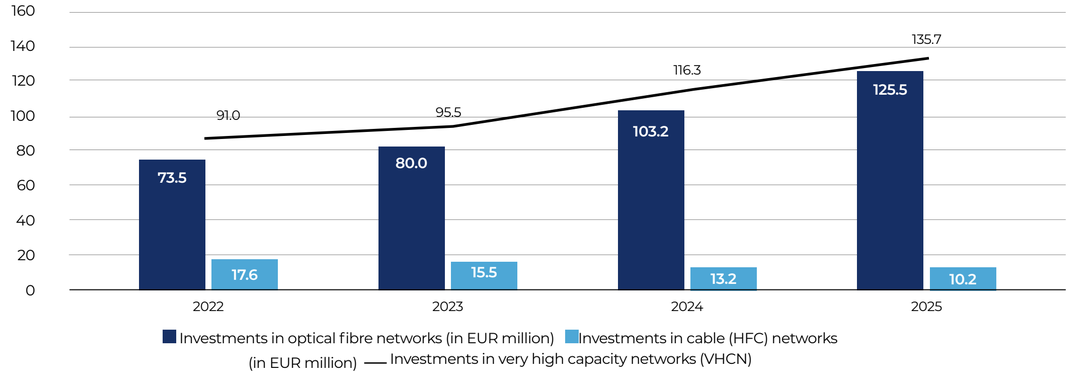


Figure 5 VHCN investments (in EUR million)

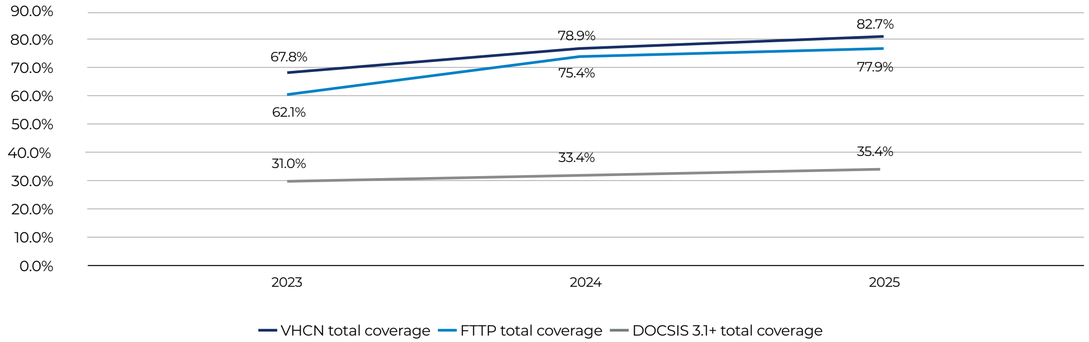


Figure 6 VHCN total coverage (% of households); Source: EU

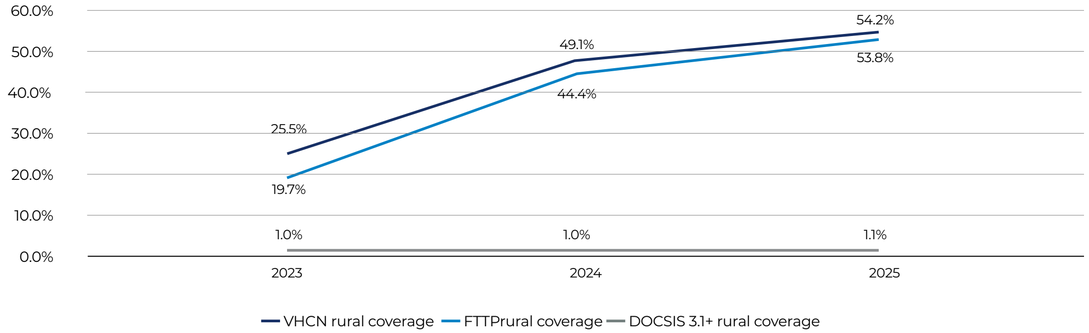


Figure 7 VHCN rural coverage; Source: EU

Data on broadband access availability are collected on a quarterly basis, and aggregate results are published on HAKOM's GIS portal. The portal also publishes the notices of intent to deploy optical fibre distribution networks, which operators are required to submit in accordance with the Ordinance on optical fibre distribution networks. The number planned new connections has been on the increase for the last few years.

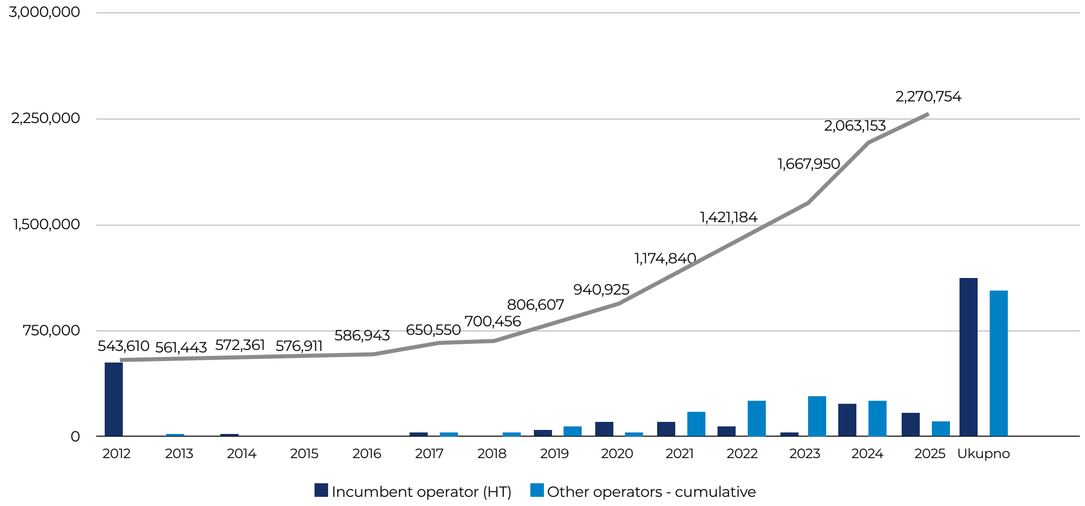


Figure 8 Number of users of optical fibre distribution networks – notices of intent to deploy

Development of 5G networks

During 2025, investments in the development of 5G networks continued, resulting in a further increase in both overall and rural household coverage with the 5G signal. The development of 5G networks is an important foundation for the further development of digital services, innovations and advanced communication solutions.

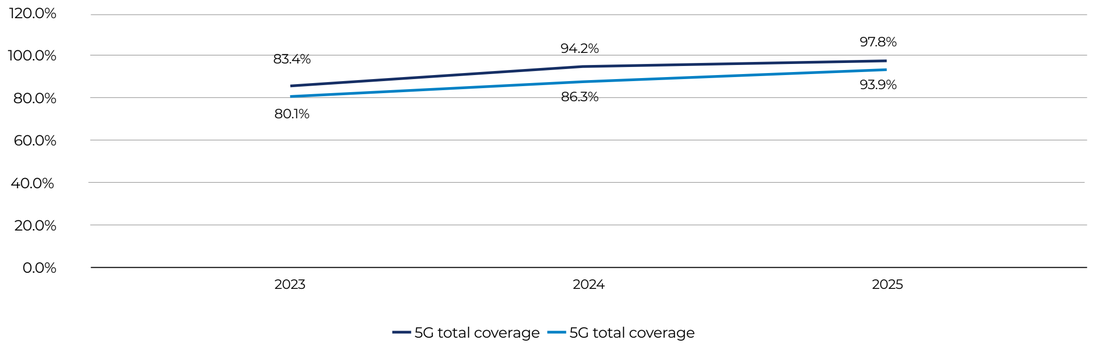


Figure 9 5G coverage (% of households); Source: EU

3.2 ELECTRONIC COMMUNICATIONS SERVICES

3.2.1 Broadband internet access

In 2025, revenues from broadband internet access services continued their long-term growth trend, increasing by 6 percent from the previous year and reached EUR 946m, which is almost a half of total revenues in the electronic communications market.

The migration of users from the copper-based access infrastructure to fibre access networks continued at a strong pace. The number of xDSL connections decreased sharply as a result, down by approximately 84,000 from the previous year. At the same time, the number of FTT-H/B/DP connections increased, by almost 120,000 on an annual level. This brought the number of optical fibre connections significantly close to that of copper connections for the first time, so that optical fibre access is expected to become the dominant means of accessing the internet via fixed networks in 2026.

Cable networks (DOCSIS 3.x) once again recorded a decline in the number of connections this year, while the fixed wireless access category experienced moderate growth. The satellite access recorded the largest relative increase, with the number of connections more than tripling, indicating a gradual strengthening of this type of access in the areas with a limited availability of other technologies.

The number of fixed internet access connections continued to grow moderately, with 40 percent of connections provided over optical fibre access.

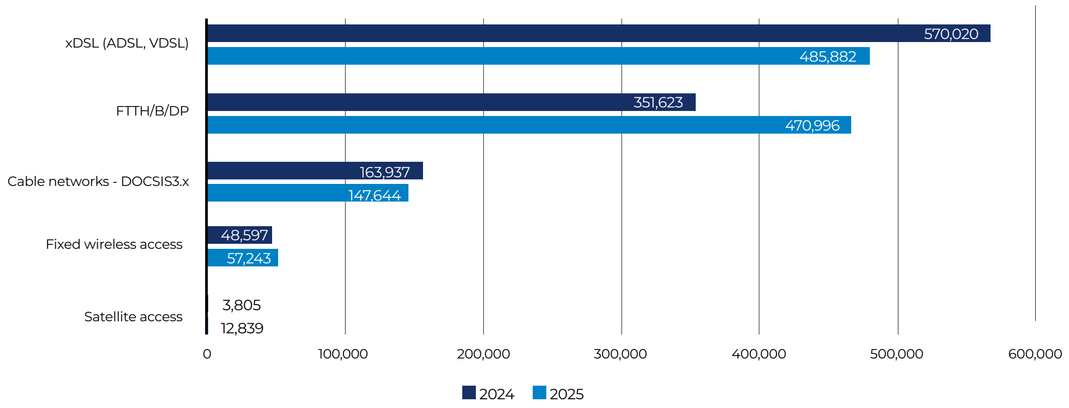


Figure 10. Connections by the access network technology

The structure of connections in the fixed network broken down by contracted access speeds shows a marked increase in connections with speeds above 300 Mbit/s, which were by the end of 2025 used by 42 percent of users. The most pronounced increase was that of connections with speeds between 300 Mbit/s and 1 Gbit/s, the number of which increased from just 16,800 2022 to 364,300 in 2025. The number of connections with contracted speeds of at least 1 Gbit/s also increased significantly, almost quadrupling over the period under review to reach more than 130,000 in 2025. Such trends clearly reflect the effects of intensive investment in the optical fibre infrastructure and confirm the growing demand from users for very high speeds.

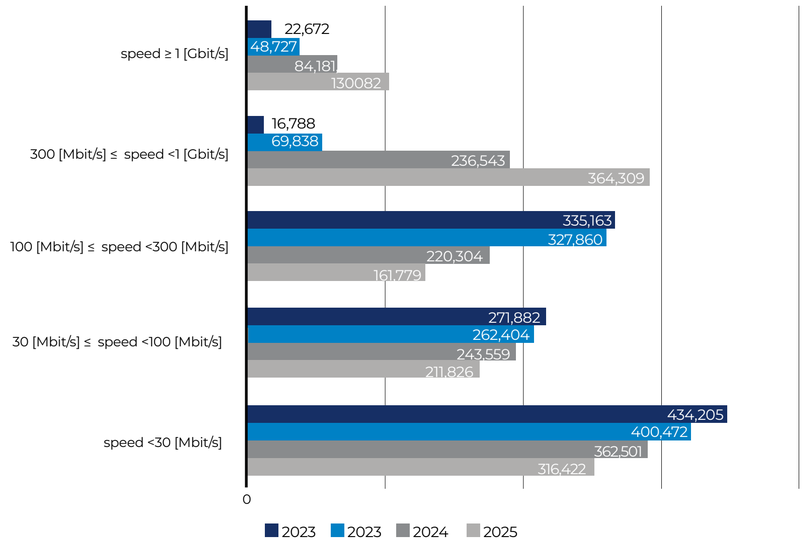


Figure 11 Number of fixed connections by contracted access speeds

Total data traffic increased from 2,800 PB in 2021 to almost 5,900 PB in 2025, more than doubling in this four-year period. This trend confirms users' growing demand for data-intensive services, particularly in fixed networks, which account for around 73 percent of total traffic and drive the most of the overall growth. .

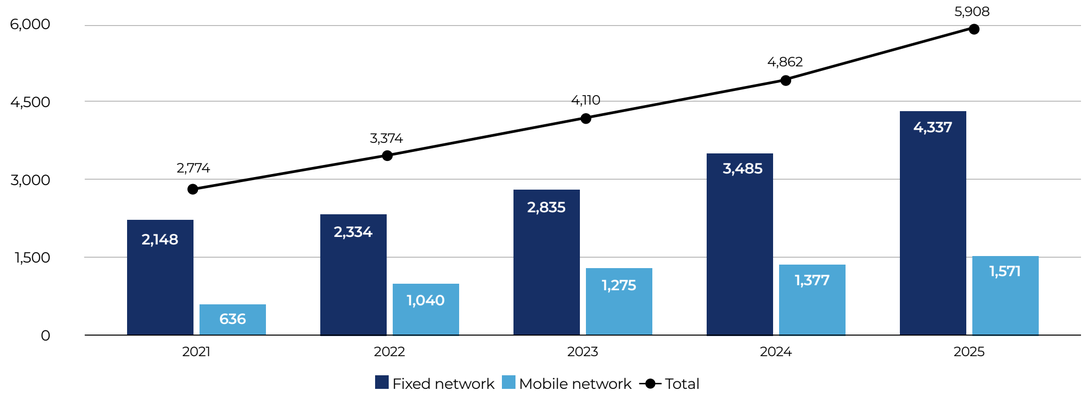


Figure 12. Data traffic

3.2.2 Pay-TV service

In 2025, the total number of pay-TV subscriptions increased by 1.3 percent to 939,653.. Although most of the technologies under observation are experiencing a decline in the number of subscriptions, there was robust growth in the fixed-network operators' own OTT pay-TV services[2], which rose by 58.6 percent from the previous year. By the end of 2025, one in five pay-TV subscriptions was based on this type of service.

Despite the growing OTT offering, IPTV remains the dominant technology among pay-TV subscribers. Changes in the technological structure of connections indicate that operators will continue to adapt their offerings to evolving consumer preferences and changing patterns of audio-visual content consumption.

2 In 2023, HAKOM started to collect data on the number of own OTT pay-TV services rendered by fixed network operators, as these operators began delivering pay TV services via OTT applications. This method of service delivery offers users wider choice as they do not have to use the internet access service of a particular operator to be able to use their pay-TV services.

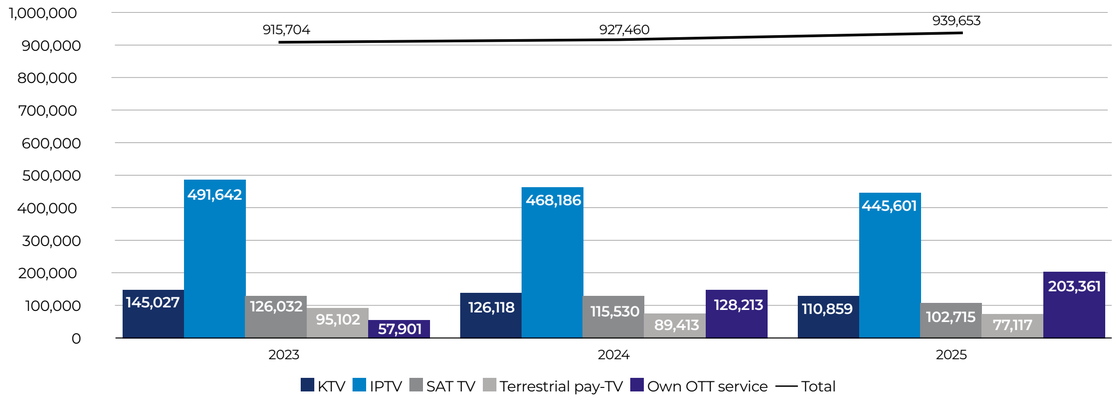


Figure 13 Pay-TV connections by technology

Total pay-TV service revenues in 2025 amounted to EUR 153.8m, representing an annual growth of 7.6 percent. The largest contribution to the revenue growth came from the operator's own OTT pay-TV services, further confirming the strengthening of this segment in the pay-TV market.

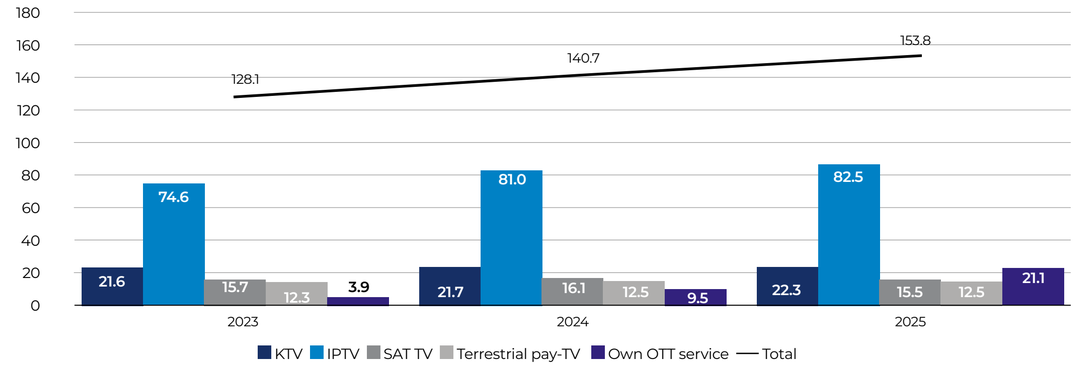


Figure 14 Revenues from the pay-TV service by technology (in EUR million)

3.2.3 Voice communications services

In 2025, the market for mobile voice communications services recorded moderate revenue growth from the previous year, while total outgoing traffic continued to decline. Such trends are linked to the growing use of data and OTT communication platforms, which are increasingly substituting traditional voice services.

The number of users of mobile voice communications services continued to grow, primarily due to the expansion of the postpaid segment. At the same time, roaming traffic generated by foreign users in national networks declined, which can be linked to an increased use of OTT applications while abroad.

Fixed voice communications services continued their long-term decline. In 2025, there was a further reduction in revenue, subscriber numbers and outgoing traffic, because of this service being replaced by mobile voice communications services and various over-the-top (OTT) communication solutions. Although the fixed voice communications service remains part of certain bundle offers, its relative importance in the overall structure of electronic communications continues to decline.

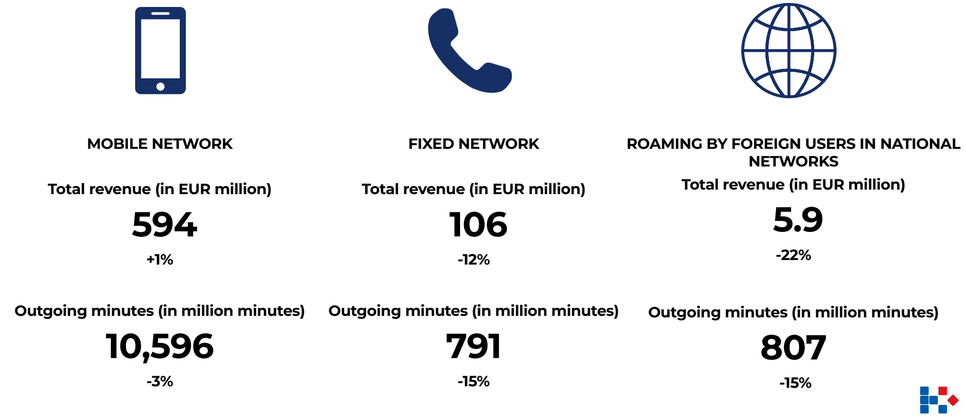


Figure 8 Public voice service indicators

3.3 QUALITY OF ELECTRONIC COMMUNICATIONS SERVICES

Neutrality and open internet access

In the Republic of Croatia, HAKOM is responsible for the enforcement of the rules on open internet access in accordance with Regulation (EU) 2015/2120 of the European Parliament and of the Council. The purpose of applying these rules is to ensure that end users have open, non-discriminatory and high-quality access to online content, applications and services, regardless of the technology used or the service provider.

To implement the aforementioned obligations, HAKOM continuously monitors the market for internet access services, handles user complaints, conducts inspection supervision activities and collaborates with internet service providers to ensure compliance with the regulatory framework.

Network neutrality in 2025

In 2025 HAKOM did not receive any complaints from end users relating to the blocking, slowing down or discriminating between specific applications, services or content, nor any complaints of price discrimination in relation to internet access. No significant changes in the offering of new products or services that could have an impact on the principles of net neutrality were recorded.

The Annual Report on the Implementation of Regulation (EU) 2015/2120 for 2025 confirms a stable and positive state of open internet access in the Republic of Croatia. During the reporting period, two inspection decisions were issued, while the remaining open issues were generally resolved through dialogue with internet service providers.

Overall, it can be concluded that the market's level of compliance with net neutrality rules, operator cooperation and public awareness are at a satisfactory level.

Service quality and user experience

The quality of the internet access service and the protection of open internet principles are continuously monitored through a combination of supervisory activities, measurement tools and research into end user experience. At the end of 2025, the regular annual survey of internet usage habits and user experiences in the Republic of Croatia was conducted on a representative sample of respondents, confirming a high level of internet service usage and an overall positive perception of their availability and quality. The results and analysis of the Use of and Satisfaction with Internet Services were published in January 2026.

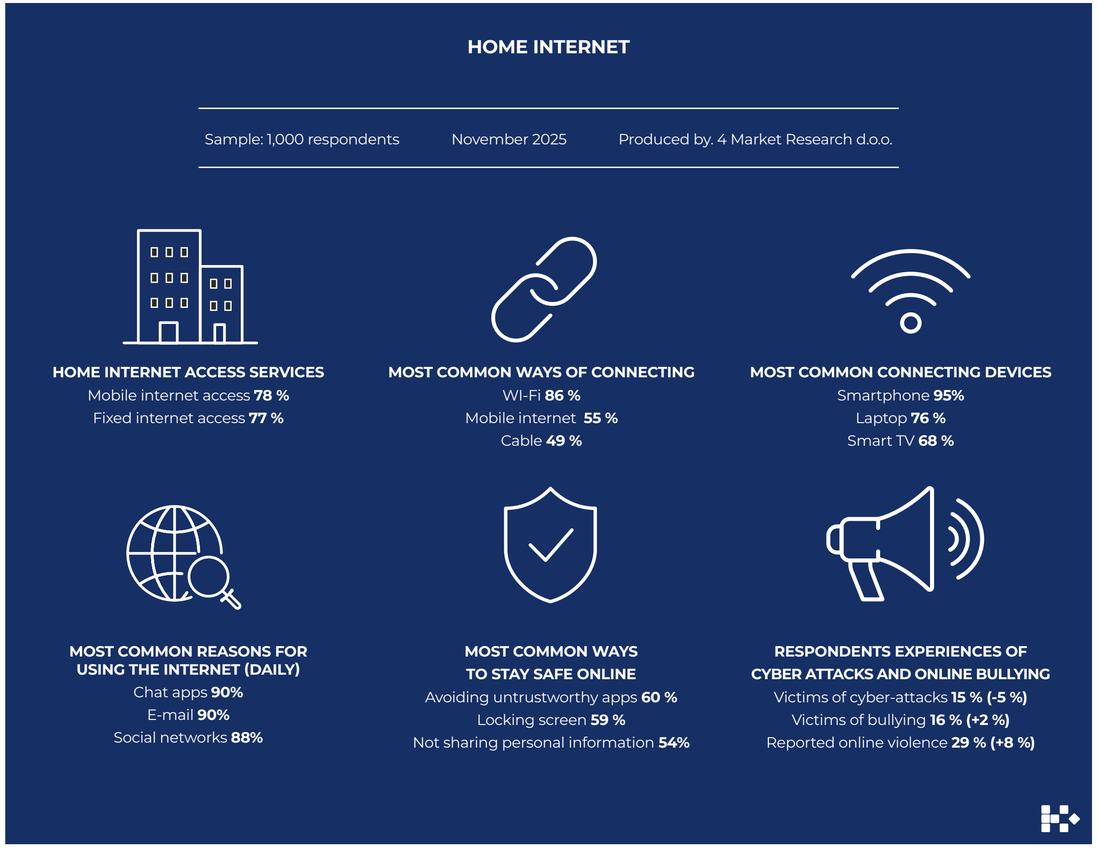


Figure 16 Results of user satisfaction survey

In addition to conducting user experience research, HAKOM twice a year analyses the quality indicators of public communications services based on data provided by operators. Analyses and reports published in the second half of 2025 and early 2026 show stable trends in service quality in fixed networks, with a reduction in the average service setup time and rapid elimination of breakdowns, as well as a further improvement in the performance of data services in mobile networks, particularly on 4G and 5G technologies. At the same time, certain indicators suggest there is room for improvement in organisational and user processes for some operators.

Service quality monitoring tools

In order to monitor the quality of the internet access service and ensure transparency, HAKOM has provided end users with HAKOMetar and HAKOMetar Plus measuring tools.

HAKOMetar is a certified tool for measuring broadband internet access speeds in a fixed network, the results of which, in the case of a certified measurement, can be used as evidence in end user complaint resolution proceedings. During 2025, more than 16,400 individual measurements were carried out, of which 79 completed measurement cycles met the criteria for lodging a complaint with operators, indicating that in most cases the contracted speeds are being delivered. HAKOMetar today supports all popular computer operating systems, including Windows, Linux and macOS platforms.

To measure internet quality in wireless networks (mobile communications networks and WLAN networks), in 2017 HAKOM launched the free HAKOMetar Plus application. The application provides information on the current wireless internet connection quality and helps raise awareness and knowledge of actual data transfer speeds and service quality over wireless networks. All measurements are displayed on a geographical map of the HR and form a quality coverage map based on user measurements..

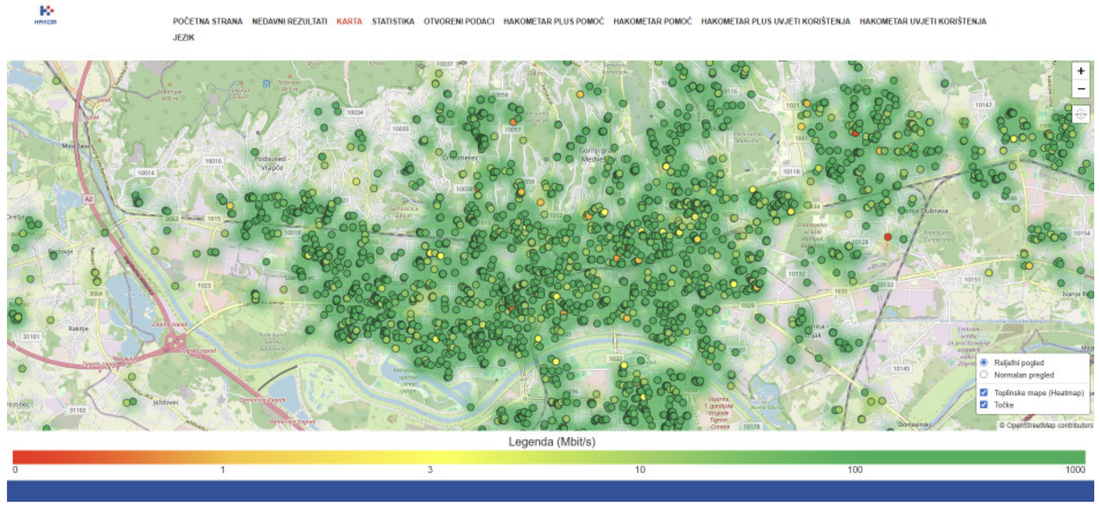


Figure 17 HAKOMetar Plus measurements in the Zagreb area

The measurement results (about 88,000 measurements in 2025) are informative and do not constitute evidence in potential complaint resolution proceedings due to the nature of the service and mobile network technology.

The results, which are summarised into aggregated values for different categories and presented geographically on maps, can be used to compare internet access offers. HAKOM also uses the results to verify whether operators have published information on coverage maps and available speeds in mobile networks in accordance with the results of user measurements.

3.4 SECURITY OF NETWORKS AND SERVICES

The security of electronic communications networks and services in the Republic of Croatia in 2025 was at a satisfactory level. In accordance with the Cybersecurity Act (CA), at mid-year there was a change to the institutional cyber incident response framework. The Security and Intelligence Agency (SOA) assumed the role of the central body for cyber incident handling and reporting at the level of the European Union.

During the reporting period, there were no large-scale cyber incidents that required the activation of national crisis mechanisms. Within the National Cyber Crisis Management Programme (NCCMP), intersectoral coordination was established under the leadership of the National Cybersecurity Centre (NCSC-HR), in which HAKOM also participates[3] During 2025, the coordination operated in its regular mode of operation and produced an annual report on the state of and trends in the Republic of Croatia's cyberspace, which also includes the electronic communications sector.

In accordance with its competence, in 2025 HAKOM conducted the initial categorisation of electronic communications operators in 2025 in accordance with the CA and notified them of their corresponding obligations. In total, 127 operators were categorised, with the specific feature of the electronic communications sector being that all operators are covered by the regulatory framework, regardless of their size or country of establishment. Data on the categorised operators was submitted to the single national register. Additionally, HAKOM developed and implemented internal safety and operational procedures (SOPs) in accordance with the NCCMP. No inspection supervisions were carried out, as operators were in the process of implementing the measures prescribed by the CA and Cyber Security Regulation.

Since the obligation to report major incidents came into effect, individual incidents and cyber threats have been reported at the national level (a total of 34 major incidents and 189 other in-

3 Office of the National Security Council (ONSC), Ministry of the Interior (MUP), Ministry of Defence (MORH) with the Croatian Armed Forces (OS RH) and the Military Security and Intelligence Agency (VSOA), the Ministry of Justice, Administration and Digital Transformation (MPUDT), the Ministry of Science, Education and Youth (MZOM), the Institute for Information System Security (ZSIS), the Croatian Academic and Research Network (CARNET), Croatian Regulatory Agency for Network Activities (HAKOM), Croatian National Bank (HNB), Croatian Financial Services Supervisory Agency (HANFA) and Croatian Civil Aviation Agency (HACZ).

cidents), while in the electronic communications sector HAKOM has received one report and analysed six incidents. This indicates a stable security situation for electronic communications networks and services, like in previous years.
In order to strengthen the resilience of networks and protect users, HAKOM' Ordinance on the manner and conditions for the provision of electronic communications networks and services lays down the obligation to implement technical solutions for recognising and blocking unwanted incoming calls with spoofed numbers, including the verification of international calls with national numbers. These measures contribute to reducing fraud and increasing user trust in electronic communications services.

In 2025, HAKOM participated in the work of relevant European bodies and expert groups in the field of electronic communications security, including the working groups of ENISA and BEREC, as well as in activities related to the security of submarine cable infrastructure.

3.5 ACCESS TO AND THE USE OF ELECTRONIC COMMUNICATIONS INFRASTRUCTURE

Access to and use of electronic communications infrastructure (ECI) are key to the development of electronic communications networks and the availability of services to end users. Within the scope of its competence, HAKOM carries out activities aimed at ensuring effective and non-discriminatory access to the infrastructure, including the drafting and implementation of secondary legislation, regulations, guidelines and forms, as well as the resolution of disputes between infrastructure operators and beneficiary operators.

Special attention is paid to the shared use of cable ducts, physical infrastructure within buildings and optical fibre installations, as well as to collocation issues and the establishment of technical specifications. This promotes the efficient use of existing resources and reduces the need to duplicate infrastructure.

Right of way

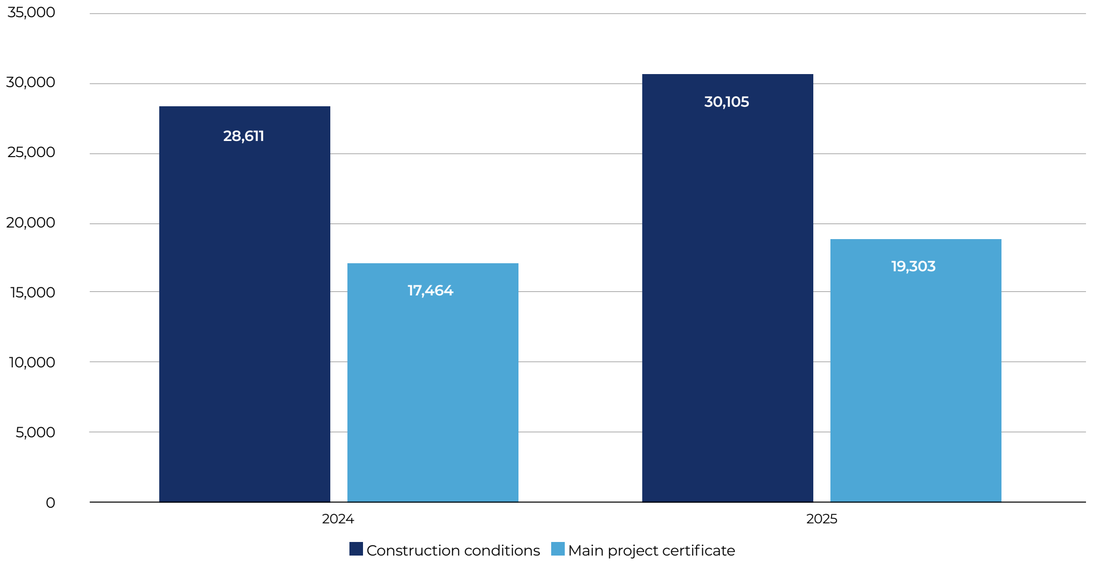
The right of way is the right to access, install, use and maintain an electronic communications network and associated infrastructure on the real estate, while providing appropriate compensation to real estate owners and managers. Right of way certificates are issued on the basis of the applicable legislative framework, at the request of infrastructure operators.

In 2025, a total of 375 right of way certificates were issued to natural persons, and 7 certificates to infrastructure operators relating to new, undeveloped infrastructure. The certification procedures are conducted on the basis of proper documentation, and their aim is to legally regulate the use of real estate and to enable the collection of the associated fees.

Activities in the field of physical planning and construction

HAKOM, as a body governed by public law, participates in physical planning and construction procedures insofar as they relate to electronic communications infrastructure. This includes providing guidance for the preparation of physical plans, participating in public consultations, issuing opinions on draft physical plans as well as establishing special construction conditions and granting main project certificates.

In 2025, 598 guidelines for the preparation of physical plans at all levels were issued, along with 392 opinions on proposals for physical plans. Compared to the previous year, there was an increase in the number of requests for establishing special construction conditions and granting main project certificates, which indicates a continuation of investment activity in the construction sector and in the field of electronic communications infrastructure.



Slika 18. Special construction conditions and requests for main project certificates

3.6 ADDRESSING AND NUMBERING SPACE MANAGEMENT

The management of the addressing and numbering space encompasses the planning, allocating and supervising the use of the addressing and numbering resources, and ensuring their efficient and non-discriminatory use in the electronic communications market. Within the scope of its competence, HAKOM develops and implements the Addressing Plan and the Numbering Plan, adopts the relevant regulations and maintains central information systems that facilitate the straightforward use and portability of numbering and addressing resources.

HAKOM is in charge of the Central Administrative Database of Ported Numbers (CADPN), which is a technical precondition for the number porting service, and for the maintenance of the e–Operator system, which enables operators to electronically submit requests for the assignment, transfer or revocation of rights to use addressing and numbering resources.

In 2025, HAKOM received a total of 84 requests relating to the allocation, transfer or revocation of rights to use numbering resources, which is a decrease from the previous year. The majority of requests received related to the primary assignment of numbering resources, while requests for the transfer of number usage rights were rare and none were recorded in 2025.

The most frequently requested numbering and addressing resources were for fixed electronic communications network services, M2M services, personal numbers, short codes for SMS/MMS services and network ID codes. The structure of requests received reflects a stable market situation and the continued use of the existing numbering and addressing framework.

Table 2. Number assignment requests

Type of service	Number of requests	Allocated resources (numbering)
Fixed electronic communications network services	39	36,500
Six-digit SMS/MMS short codes	8	12
Freephone services (800 and 801)	9	12
NetID codes	2	2
M2M services access codes (890××) -	1	900,000
Personal number services (75)	3	6,800
Socially sensitive services (EU harmonised short code) 116×××	1	1

3.7 REALISATION OF PLANNED ACTIVITIES

Analyses of relevant markets

The decisions on the analyses of the market for wholesale dedicated capacity (M2/2020) and the market for wholesale trunk segments of leased lines (M14/2003) were adopted in June 2025.. These wholesale services are used by operators to develop their own networks, interconnect their networks with those of other operators for the provision of other electronic communications services at the retail level or connect base stations. They are also essential for the provision of services to business users - businesses and public institutions, where they are part of complex and tailor-made packages comprising publicly available fixed and mobile telephone services, data transmission services, broadband internet access services, cloud computing services, remote surveillance services, etc. In addition, these services are used to establish virtual private networks (VPNs) or connect branches at various fixed locations, including data centres, for the purpose of exchanging (transferring) data and accessing business applications.

For the first time, a detailed geographical analysis was carried out in the wholesale dedicated capacity market to assess whether competitive conditions were sufficiently homogeneous across the entire territory of Croatia or whether geographic segmentation of the market and differentiated regulation would be appropriate. Given that these services are used to connect multiple locations of the same user, which may be situated in different geographical areas, it was concluded that the competitive conditions are sufficiently homogeneous throughout Croatia, and the market was therefore defined as national in scope. On the other hand, the market for wholesale trunk segments of leased lines was divided into routes where competition exists (a deregulated market) and those where competition does not exist.

HT was designated as the operator with significant market power and is subject to the regulatory obligations imposed by the market analyses the analyses. Upon the adoption of those analyses, HT amended its reference offer for the wholesale dedicated capacity service, and HAKOM assessed its compliance with the imposed regulatory obligations.

Pursuant to these decisions, HT was, for the first time, required to conduct a margin squeeze test regarding the prices of the relevant retail offers in this market. The purpose of this obligation is to prevent HT from squeezing competitors out of the retail market and distorting market competition through excessively low retail prices. For the practical implementation of the regulatory obligation, it was necessary to develop the **Methodology for conducting a margin squeeze test in the dedicated capacity market**, as well as a tool (model) to carry out the test. Therefore, in 2025 a public procurement procedure was conducted, and the consulting firm Axon Partners

Group Consulting (Axon) was selected to develop the aforementioned methodology and model in cooperation with HAKOM, and work on this project commenced.

The analyses of the market for wholesale local access provided at a fixed location (M1/2020) and the market for wholesale central access provided at a fixed location for mass-market products (M3b/2014), adopted in July 2023, defined the geographical segmentation of the high capacity services market on the basis of selected criteria for determining the competitive conditions in certain areas of the HR, resulting in the deregulation of part of the national territory. Based on these decisions, a review of the status of geographical units was carried out after two years to determine whether certain geographical units had changed status to competitive or non-competitive areas. It was determined that certain geographic units were changing status to a "competitive" area, whereupon HT's existing regulatory obligations in those areas were withdrawn. Conversely, certain geographic units changed status to a "non-competitive" area, where HT is obliged to apply the regulatory obligations imposed by the market analysis decision of July 2023.

HAKOM concluded that updating the status of geographical units did not lead to different conclusions in the assessment of the effectiveness of market competition, nor did it subsequently affect the assessment of the existence of an operator with significant market power in the high capacity market – non-competitive areas. Namely, the high capacity market – competitive areas shows stable signs of competition, and the market structure continues to evolve towards effective market competition. Furthermore, in the high capacity market – non-competitive areas, HAKOM established that there were no changes regarding HT's significant market power in these areas. The conclusion is based on HT's high and stable market share, its control over the infrastructure, and the existence of significant barriers to infrastructure-based competition.

Supervision of the implementation of EoI obligations

As part of the implementation of the non-discrimination obligation, the implementation of the obligations arising from the decision introducing the Equivalence of Input (EoI) model commenced in 2025. The purpose of this measure is to ensure that HT's retail arm uses the same systems and processes as other operators using its wholesale services in order to prevent discrimination. At the end of 2025, HAKOM carried out the monitoring and evaluation of the imposed remedies. It was concluded that HT formally fulfilled the key obligations for implementing the EoI model within the prescribed deadlines. The amended reference offers were published within the stipulated timeframe, new and harmonised processes were defined, and their implementation commenced at the end of April 2025. This created the prerequisites for the processes, information, and access to technical resources between HT's wholesale and retail, as well as between HT's wholesale and access seekers, to be aligned. Access seekers were formally granted access to new wholesale services at the end user location and functional access to API (Application Programming Interface) interfaces, but in practice, they have not yet started using them. The reasons for this are primarily related to the necessary organisational and financial adjustments on the access seeker's side. The implementation of the EoI model will continue to be monitored in the coming period.

Calculation of the rate of return on invested capital (WACC)

All regulated wholesale prices incorporate **the rate of return on invested capital (WACC)**, which is updated once a year. The calculation of the WACC is based on the Commission Notice on the calculation of the cost of capital in the EU electronic communications sector[4], which specifies in detail the methodology for the calculation of the values of all parameters required for the WACC calculation. In November 2025, new values of the WACC were set in the amount of 5.39 percent, with an additional risk premium of 1.59 percent applied to services provided through FTTH/FTTB/FTTDP access. These values will be used in all future pricing decisions on regulated wholesale services.

Margin squeeze test methodology

HT is obliged to conduct **the margin squeeze test** for the broadband access service and the closely related IPTV service. The test is applied to services in the low capacity market and in the non-competitive areas of the high capacity market in accordance with the Margin squeeze test methodology. The margin squeeze test is used to assess whether a product's retail price is sufficient to cover the total costs required to offer that product. In addition to the wholesale price, operators also incur their own downstream costs. Downstream costs are estimated by adjusting the costs of an operator with significant market power. The adjustment reflects the economies of scale of a hypothetical efficient operator with a smaller market share.

In January 2025, HAKOM aligned the Methodology with market conditions and the findings of analyses of the wholesale local access and wholesale broadband access markets, according to which the market is segmented into the low capacity market and the high capacity market. The key change is that the adjustment of HT's costs, which reflects economies of scale and the negotiating power of a hypothetical efficient operator, is carried out separately for the low capacity market and the high capacity market – non-competitive areas. Consequently, the margin squeeze test implementation tool, under which all new packages and benefits have been tested since March 2025, was also adapted, and HT was required to cease offering and contracting existing packages and promotional benefits that do not satisfy the MS test.

4 Communication from the Commission Commission Notice on the calculation of the cost of capital for legacy infrastructure in the context of the Commission's review of national notifications in the EU electronic communications sector (Text with EEA relevance) 2019/C 375/01

In late 2025, HAKOM commenced its regular annual update of retail costs and consumer habits in the margin squeeze test. The update will be completed in the first quarter of 2026, and for any offers that, following the update, no longer meet the test, HT will be given a deadline to withdraw them from the price list.

MVNO access

Operators with a national licence for the use of the radiofrequency spectrum (RF spectrum)[5] are required to enable access to mobile virtual network operators (MVNOs). To ensure effective market competition, the operating conditions of MVNOs must enable them to replicate the retail services of the network operator whose network they use. For this purpose, HAKOM, has developed the MVNO ERT model, a tool designed to evaluate the economic replicability of retail offers of operators providing the MVNO access. The model was developed in collaboration with the consulting firm Axon, considering the proposals and comments of stakeholders submitted to a public call.

In addition, for the purpose of monitoring the obligations assumed from licences for the use of the RF spectrum, HAKOM analysed the received requests for the wholesale MVNO access. Despite the interest of individual operators and business entities, no commercial MVNO model has been realized in the HR to date. Although three network operators (A1, HT and Telemach) received several initiatives, all processes ended at the stage of preliminary discussions or technical-commercial negotiations. Given the current course of negotiations, it can be concluded that there is interest in MVNO approach in the HR, but that there are still obstacles to the implementation of such models. Therefore, continuing the dialogue between network operators, HAKOM and potential MVNO partners is essential. The MVNO ERT model will also contribute to this.

Retail Price Monitoring and Analysis Methodology

In order to enable the systematic monitoring and analysis of the price trends of broadband internet access services and to detect in a timely manner developments that may affect competition, in 2025 HAKOM developed a **Retail Price Monitoring and Analysis Methodology**. When developing the Methodology and questionnaire for data collection, HAKOM consulted the operators beforehand. As of 2026, data on retail tariffs for broadband access services have been collected in accordance with this methodology.

OTT Services Data Collection Methodology

Due to the increasing use of OTT services, in 2025 HAKOM developed an **OTT Services Data Collection Methodology**, on the basis of which it will start collecting data on the use of these services in 2026. This will allow monitoring the evolution of the OTT services market and its impact on the electronic communications services market. Data will be collected for two basic categories of OTT services: number-independent interpersonal communications services (NI-ICS) and audiovisual content services (VOD/Live TV).

Opinions on reference offers for access to networks co-financed by EU funds

Under the National Framework Programme (NFP), aimed to support the development the broadband infrastructure in areas where there is no sufficient commercial interest to invest, HAKOM issues opinions on wholesale conditions and fees for access to networks co-financed by EU funds. After the initial approval of wholesale fees and conditions, HAKOM carries out a subsequent verification of conditions and fees once a year in order to adapt to changes in the market. The level of fees is checked using benchmarking with regard to the same or comparable services offered in other areas of the HR, including the prices of regulated services. The table below shows the projects for which HAKOM issued opinions in 2025.

Table 3. Projects within the NFP for which HAKOM issued opinions

Network operator	Type of access network	Area covered	Type of verification	Opinion issued
A1 Hrvatska d.o.o.	optical fibre	Solin, Kaštela, Ivanić-Grad	subsequent	April 2025
A1 Hrvatska d.o.o.	optical fibre	Cities of Županja and Knin, the municipalities of Biskupija, Civljane and Kijevo, Bilice, Primošten and Rogoznica	initial	April 2025
Elkomnet d.o.o.	optical fibre	Virovitica-Podravina County (the municipalities of Crnac, Čačinci, Čađavica, Mikleuš, Nova Bukovica, Sopje, Voćin and Zdenci)	subsequent	April 2025
Hrvatski Telekom d.d.	wireless	Area of the Osijek-Baranja County, Brod-Posavina County, cities of Rovinj, Poreč, Zaprešić, Dubrovnik, Mursko Središće, Sveta Nedelja, Vukovar, Ludbreg and Omiš and the municipalities of Đurmanec and Medulin	subsequent	May 2025
A1 Hrvatska d.o.o.	wireless	Solin, Kaštela, Ivanić-Grad	subsequent	June 2025

5 The documents Public auction for the granting of rights for the use of the radiofrequency spectrum in the 700 MHz, 3600 MHz and 26 GHz frequency bands and the Public Auction for the granting of rights for the use of the for radiofrequency spectrum in the 800 MHz, 900 MHz, 1800 MHz, 2100 MHz, 2600 MHz and 3600 MHz frequency bands, as well as individual licences for the use of the radiofrequency spectrum, lay down the conditions for the use of the assigned spectrum.

Hrvatski Telekom d.d.	wireless	City of Bjelovar and the municipalities of Rovišće, Zrinski Topolovac, Kapela, Veliko Trojstvo, Severin, Šandrovac, Nova Rača, Imotski and the municipalities of Lokvičići, Podbablje, Proložac, Runovići, Zmijavci, the city of Vinkovci, the area of Neretva, the city of Pula, the area of Novalja, the municipality of Bebrina, Brodski Stupnik, Bukovlje, Oriobvac, Podcrkavlje and Sibinj	initial	October 2025
Kotar net d.o.o.	optical fibre	Area of the municipalities of Sukošan, Sveti Filip i Jakov, Galovac and Škabrnja	subsequent	November 2025
Smart Island Krk d.o.o.	optical fibre	Area of the Island of Krk	subsequent	January 2026

Universal service

Universal service comprises an internet access and public voice communication service of a certain quality that must be available to every citizen of the HR at any reasonable location at an affordable price. It also includes special offers with prices for services tailored to the needs of a socially vulnerable group of citizens.

Once every three years, HAKOM carries out a procedure to determine whether there is a need to designate a universal service operator. In October 2024, Hrvatski Telekom d.d. (on the entire territory of the Republic of Croatia), A1 Croatia (in 19 geographical units/municipalities) and Telemach Croatia (in five geographical units/municipalities) were declared universal service operators on the territory of the Republic of Croatia for a period of three years starting from 1 December 2024. By the same decision, all three operators were also declared universal service operators for affordability throughout the national territory, with the price of an internet access service with a minimum speed of 14/1 Mbit/s amounting to EUR 6.77.

The decision extended the categories of end users entitled to the USO package for socially vulnerable users. This right can now be exercised by the beneficiaries of the guaranteed minimum benefit, the beneficiaries of the right to an inclusion allowance of the first, second or third level of support who are not provided with accommodation or organised housing, the beneficiaries of the national benefit for the elderly, the beneficiaries of the allowance for unemployed Croatian Homeland War veterans and their family members, the beneficiaries of the allowance for civilian victims of the Homeland War and the beneficiaries of the energy vulnerable consumer allowance, including their household members. In 2025, a total of 2,695 requests were submitted to ensure the availability of the universal service, with only 1% of the requests rejected due to the technical impossibility to connect the end user's location. During the same period, 943 applications for the USO social package were submitted and the total number of accepted applications at the end of 2025 was 615.

Broadband-ready label

With the entry into force of the Gigabit Infrastructure Act (GIA) in November 2025, certain changes were introduced in the regulatory framework and it was decided to abandon the issuance of the label as an unnecessary cost, as all investors in infrastructure must anyway build it so that it is ready to connect to gigabit networks.

Additional activities

In order to align with the conclusions of the relevant market analyses, a decision on updating the Instructions on accounting separation and cost accounting of the universal service provider was adopted in February 2025. The Instructions prescribe the manner of implementation of the regulatory obligation of accounting separation and cost accounting in the relevant markets where HT, as an operator with significant market power, has been imposed this obligation. The amendments focus on aligning the list of services covered by accounting separation, updating the unit cost calculation with the market situation, amending the way the current cost of assets is calculated, and extending the list of assets for which the indexation method can be used to estimate them.

In June 2025, a decision was adopted to allow HT to decommission part of the copper access network in Točionik (Dubrovačko primorje municipality), given its poor technical condition and the fact that the optical fibre network is already available to users. At the same time, obligations to protect end users were laid down, including timely notification, the possibility to switch to an alternative solution on optical fibre or to terminate the contract without penalty, and a prohibition on imposing additional services on users who only had a telephone service as a condition for switching to the optical fibre network.

In June 2025, a request for amendments to reference offers was received to introduce a temporary replacement solution that would apply during the waiting period to remedy the disturbance. After several consultations with HAKOM and a public call, in which the opinions of beneficiary operators were collected, HT published amended reference offers in April 2026, which, in order to protect end users and preserve competition, enabled the use of a temporary solution at the wholesale level as offered to retail users.

HAKOM's activities in the electronic communications market in 2025							
No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Fina-ncial Plan	Realised outcome	Impleme-ntation assessment and recomme-ndations
1.	4.2	Complete the analysis of the market for wholesale dedicated capacity (M2/2020 and M14/2003)	Analysis of the relevant market completed Regulatory obligations defined	II/II	N	Decisions on market analysis and regulatory obligations adopted (M2/2020 and M14/2003) RIA carried out	Achieved
2.	4.1, 1.1	Harmonise SMP operator regulatory obligations with the analysis of the market for wholesale dedicated capacity	SMP operator regulatory obligations harmonised Relevant reference offer amended	IV/IV	N	Amended reference offer for the wholesale dedicated capacity service in line with regulatory obligations	Achieved
3.	2.1, 2.2	Verify the status of geographical units in wholesale broadband access markets (M1/2020 and M3b/2014)	Geographical units belonging to competitive/non-competitive areas determined Certain regulatory obligations revoked or defined, depending on the competitiveness status	III/IV	N	Decisions updating the lists of geographical units belonging to competitive/ non-competitive areas adopted and regulatory obligations revoked/ defined, depending on the change in status	Achieved
4.	1.3.	Supervise the implementation of equivalence of input models (EoI)	Report on the status of implementation of the EoI and recommendation for further action	IV/IV	N	Internal report on the EoI model implementation status prepared	Achieved
5.	1.3	Adapt MST tool in accordance with changes to the Methodology	MST tool amended and all retail offers for which the test is carried out tested	I/I	N 3237	Amendments to the Methodology adopted MST implementation tool adapted All offers tested according to the new model	Achieved
6.	1.3	Analyse retail prices	Retail price analysis methodology prepared	IV/IV	N	Methodology and data collection questionnaire prepared	Achieved
7.	1.3.1.3	Develop a model for assessing economic replicability of the network operator's retail offers in the context of MVNO access	Developed model to be used for the assessment of economic replicability of the network operator's retail offers, taking into account various modalities of the wholesale MVNO access and pertaining retail costs	IV/IV	N 3237	MVNO ERT model developed	Achieved
8.	1.3	Amend market review questionnaires to collect data on OTT services	Possibility of collecting data on OTT services analysed and data collection questionnaires created	I/III	N	Methodology and data collection questionnaire prepared	Achieved
9.	1.1	Update WACC values	WACC values established	IV/IV	N	Decision on WAAC values adopted	Achieved
10.	1.1	Apply the economic replicability test to assess the economic replicability of very high capacity networks	Economic replicability test is applied where needed for the purpose of implementing symmetric regulation	Ongoing	N	There were no requests	Achieved

11.	1.1	Amend reference offers	New wholesale conditions in reference offers	Ongoing	N	2 requests analysed	Achieved
12.	2.3	Issue opinions on reference offers for access to networks co-financed from EU funds	HAKOM's opinions regarding reference offers	Ongoing	N	8 opinions issued	Achieved
13.	1.1	Conduct the margin squeeze test (MST)	Tariff packages/ offers of operators subject to the MST in accordance with the methodology	Ongoing	N	All received offers tested within the time limit	Achieved
14.	1.2	Collect and process data on EC market	Reports on EC market indicators	Quarterly	N	4 reports on EC market indicators published	Achieved
15.	2.2	Supervise the implementation of regulatory obligations	Analysis and disclosure of regulated wholesale KPIs, supervision administrative acts	Ongoing	N	Quarterly reports published Inspection supervisions started/ completed	Achieved
16.	4.1	Resolve regulatory disputes between operators	Administrative acts	Ongoing	N	7 disputes resolved	Achieved
17.	4.1	Implement activities related to roaming regulation	Support to BEREC and opera-tors	Ongoing	N	Contribution to the preparation of BEREC's opinion on the assessment of Roaming Regulation	Achieved
18.	3.1	Monitor and supervise the implementation of MVNO access obligations	Enabled access to MVNOs	Ongoing	N	Internal report on the implementation of MVNO access obligations prepared	Achieved
19.	3.2	Process reported security incidents	Internal report and/ or intersectoral report and/or Inspection supervision	Ongoing	N	6 incidents analysed, no inspection supervisions	Achieved

20.	3.1, 5.1	Analyse the security of networks and services	Reports on cyber incidents and network security Quarterly reports (SOP) Annual reports (SOP)	 Quarterly II/II	N	Quarterly reports and annual report prepared	Achieved
21.	5.1	Draft subordinate legislation to the CSA in cooperation with other bodies of the national working group	Regulation drafted National Cyber Crisis Management Programme prepared HAKOM's in-house SOP developed	I/I	N	Regulation drafted NCCMP prepared In-house SOP developed	Achieved
22.	1.3	Categorise entities pursuant to the CSA and CIA	Register of essential, critical and important entities established Notifications on the rights and obligations of operators prepared and submitted	II/II	N	Register of essential, critical and important entities established Notifications to operators submitted	Achieved
23.	3.1	Develop guidelines for important entities in accordance with the CSA and the Regulation	Guidelines developed, on their own or as part of an annex to the ordinance	III/III	N	Guidelines developed	Achieved
24.		Promote the use of IPv6 addresses in cooperation with other relevant authorities	National guidelines developed	IV/IV	N	Guidelines developed and submitted to the MJPADT	Achieved
25.	2.1	Implement net neutrality rules (TSM Regulation)	Operators comply with TSM Regulation Opinions and comments for BEREC Annual Report for BEREC and EC	Ongoing Ongoing II/II	N	Opinions for BEREC prepared Annual report for BEREC and EC prepared	Achieved
26.	2.1	Analyse quality parameters for operators' service provision	Semi-annual reports	I and III/I and III	N	Reports published	Achieved

27.	2.1	Manage the addressing and numbering space	Numbering and addressing plan Decisions to operators on the assignment of addressing and numbering resources	Ongoing	N	84 acts issued Annual internal report prepared	Achieved
28.	2.1	Ensure and monitor the number porting process	CADPN system in operation	Ongoing	N	Available >99% of the time	Achieved
29.	2.1	Supervise the quality of universal service provision in electronic communications	Annual report on universal service provision quality	Ongoing	N	Report published	Achieved
30.	2.1	Process registration applications and notifications on the start or termination of the provision of electronic communications services	HAKOM's certificates and updated list in the e-Operator EU register of operators updated with Croatian operators	Ongoing	N, 3238, 454	82 certificated issued EU register of operators updated	Achieved
31.	2.1	Supervise the implementation of regulatory obligations for the ECI	Analysis of regulated KPIs for the shared use of cable ducts	Ongoing	N	Internal report prepared	Achieved
32.	2.1	Implement the GIA in cooperation with other public law bodies in the working group	Regulatory amendment proposal	Ongoing	N	Proposal prepared; regulations in the adoption procedure	Achieved
33.	2.1	Upgrade the data collection system for the geographical review of coverage by broadband networks and their use (mapping) – GIS portal	GIS portal upgraded	III/III	N, 454	Improved software enables faster and easier retrieval of targeted GIS portal data	Achieved
34.	2.1	Collect and process data on broadband access coverage	Graphical display accessible on the GIS portal	Ongoing	N, 3237	Data collected, processed and accessible on the GIS portal	Achieved
35.	2.1	Issue opinions in the procedure of drafting and adoption of physical plans and public consultations, including the State Plan for Spatial Development	HAKOM's opinions	Ongoing	N	392 opinions and 598 requirements-guidelines issued	Achieved
36.	2.1	Establish special construction conditions/ connection conditions/ grant main project certificates	HAKOM's administrative acts	Ongoing	N	19,303 main project certificates granted, and 30,157 special construction conditions established	Achieved
37.	2.1	Identify the infra structure operator (right of way)	Right of way certificates	Ongoing	N	7 right of way certificates for infrastructure operators (new ECI) and 375 right of way certificates for natural persons issued	Achieved
38.	2.1	Prepare and publish the broadband-ready label for new buildings and extensively renovated buildings	Broadband-ready label	Ongoing	N	Issuance of the broadband-ready label related to the Gigabit infrastructure Act (GIA) in full application since November 2025; labels not issued yet	

4

POSTAL SERVICES



4.1 MARKET OVERVIEW

The role of postal services in economic and social connectivity remains important, despite the rapid development of digital communication channels. Postal services enable the reliable distribution of letters, parcels and goods and support the development of e-commerce.

Structural changes in the market continued, driven by digitalisation and changes in consumer habits. While electronic forms of communication continue to reduce the need for traditional physical correspondence, the growth of e-commerce is creating increased demand for parcel delivery and influencing the development of postal service providers' distribution networks and delivery models.

Basic indicators

Total revenues in the postal services market in 2025 amounted to EUR 406m, an increase of 11.5 percent from the previous year. This is the result of price adjustments, but also of an increase in the total number of services. After a period of continuous decline in the total number of services, as has been the case for years at the EU level, the HR recorded a slight increase in the total number of postal services in 2025. The continuing decrease in the number of letter items was completely offset by the growth of printed matter and parcels. There was no significant increase in the number of services in international traffic.

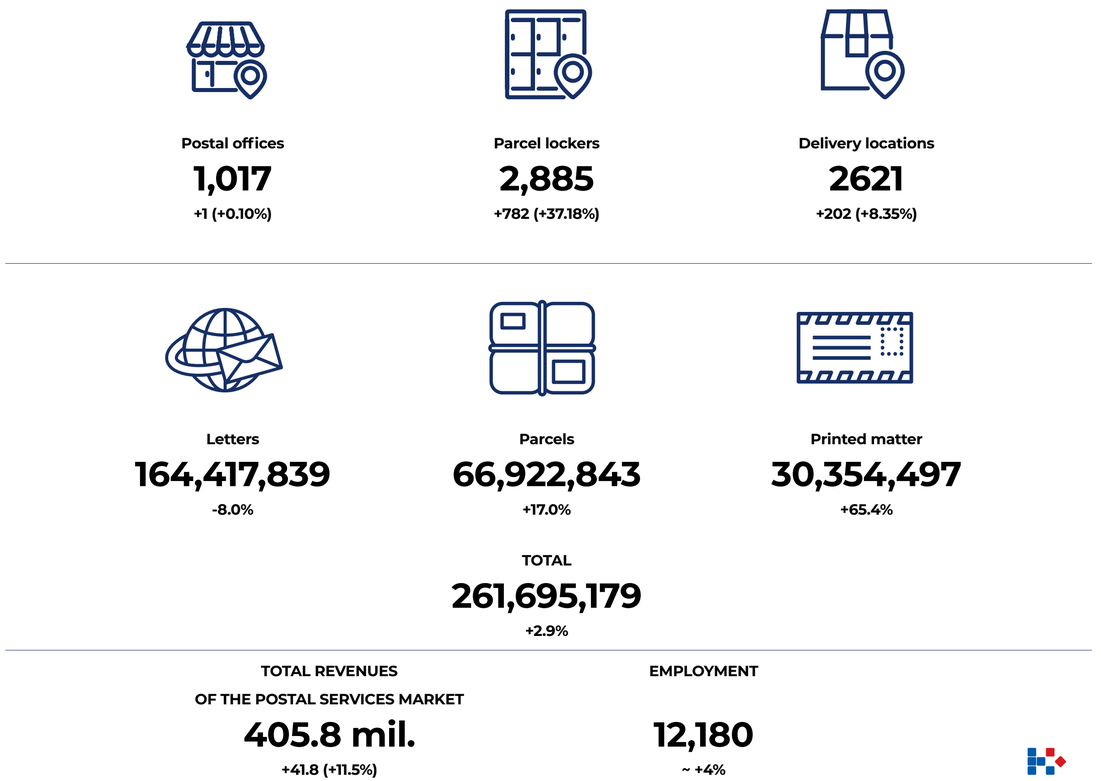


Figure 19. Basic indicators of the postal services market

Market structure and service providers

At the end of 2025, postal services in the HR were provided by a total of 24 providers – one more than in 2024. Hrvatska pošta d.d. (HP) retained its status as the sole national provider of universal postal service, while also offering interchangeable and other postal services, thereby holding a dominant market position. Alongside it, other providers also operate in the market, most of them focusing on other postal services and, more rarely, on interchangeable services.

In addition to domestic providers, global and regional postal and logistics companies are also present, operating through their own networks or in partnership with other providers in the HR. There were 13 providers offering their services in domestic and international traffic, while 11 providers offered services exclusively in the HR.

At the end of 2025, 12,180 employees were engaged in tasks directly related to the provision of postal services, representing an increase of approximately 4 percent compared with the end of 2024. The development of the network of facilities and alternative delivery points continued.

Revenues

The positive growth trend in market revenues, which has been present for years, continued into 2025. Total revenues grew significantly again, amounting to EUR 405.8m, an increase of 11.5 percent compared to 2024. This revenue growth was not evenly distributed among providers in the market. While the revenues of HP, the only provider with a universal service obligation, grew more moderately, other providers achieved more pronounced growth and increased their market revenue shares.

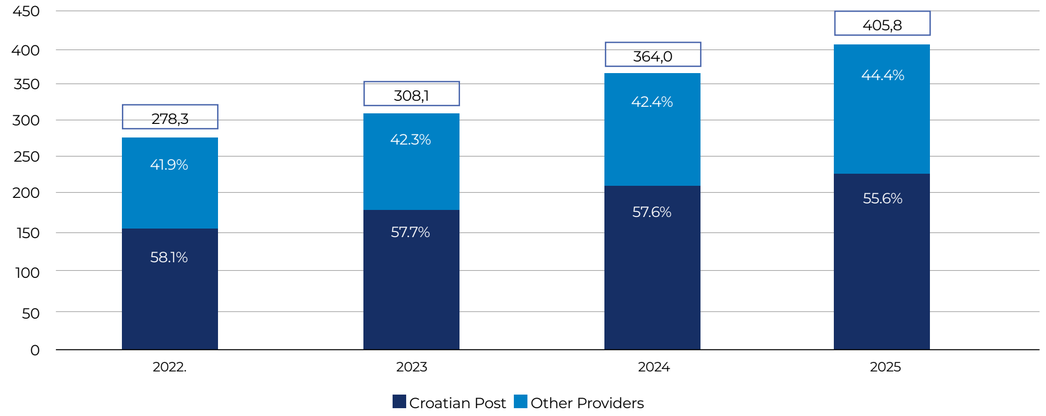


Figure 20. Total revenues from postal services (in EUR million)

The revenue structure confirms the growing importance of high-value services as the main source of growth. Although universal postal service still accounts for a significant portion of revenue, its relative share is gradually declining in favour of parcel services and other e-commerce-related services.

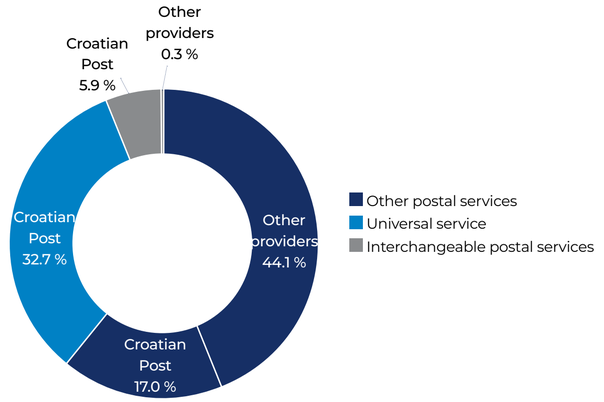


Figure 21. Shares of individual types of postal services in total revenues

4.2 POSTAL SERVICES

In 2025, the postal services market in the HR recorded a recovery in the total number of services performed, following a multi-year downward trend present in the EU for some time. A total of 261.7m postal services were performed, which is an increase of 2.9 percent from 2024. Over the longer term, the total volume of postal services continues to show a downward trend, with the growth recorded in 2025 being linked to movements in the parcel and printed matter market segments.

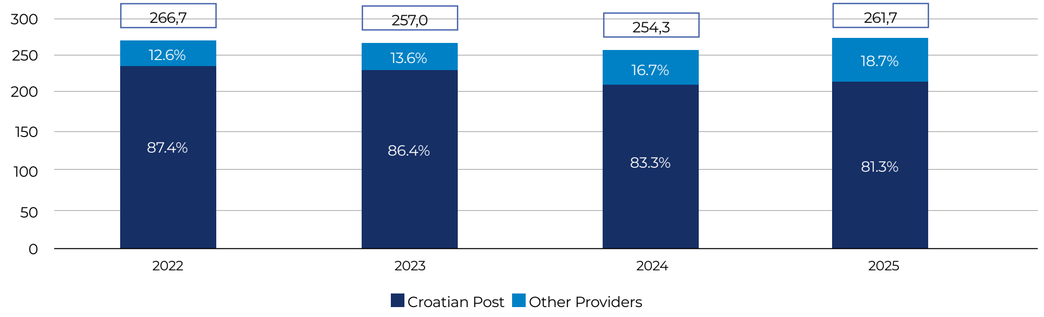


Figure 22. Total number of postal services with providers' shares (in million)

In terms of total services provided, HP remains the market's leading provider, with 212.7 million services provided in 2025, accounting for approximately 81.3 percent of the total volume. Its share continues to decline gradually, while other providers are experiencing faster volume growth and increasing their market presence.

In 2025, the number of services performed by HP only slightly increased, by 0.5 percent, while other providers achieved growth of 15.2 percent. Despite these changes, the trend of decline in the universal service's share in the total volume continued, although at 40.9 percent it still retains the leading position in the market. This represents a fall of around 4 percentage points compared to the previous year, so that other postal services, which accounted for 40.3 percent of the market's traffic, could soon take the lead.

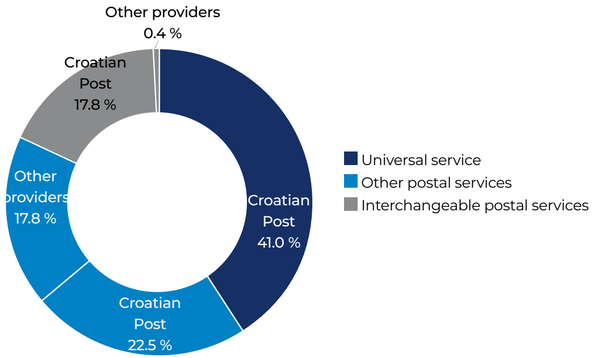


Figure 23. Shares of types of postal services

International postal traffic in 2025 comprised 21.4 million services and maintained a stable share in the total number of postal services, at around 8.2 percent. Compared to previous years, this segment did not see a significant increase in volume, and its movements are still largely linked to the development of cross-border trade and logistics flows.

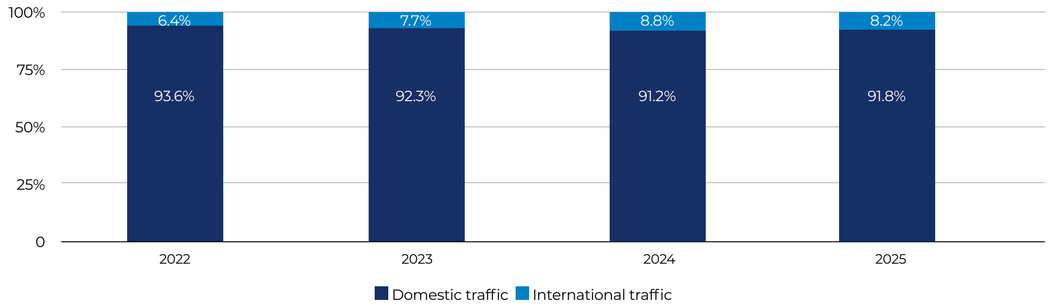


Figure 24. Shares of postal services by types of traffic

An analysis of the structure of postal services by type of postal item confirms the continuation of long-term structural changes in the market. During 2025, the number of letter items continued to decline, dropping by 8 percent, while parcel services and printed matter recorded strong growth. Of particular note is the increase in the number of printed matter, up by 12 million, or 65 percent, which could be attributed to HP's distribution of printed media. The number of parcels delivered increased by 17 percent in 2025 from the previous year and cumulatively by around 62.7 percent over a period of just three years. This has also affected the service structure, with parcels now accounting for over a quarter of all services, while the number of letter items has fallen to less than two-thirds.

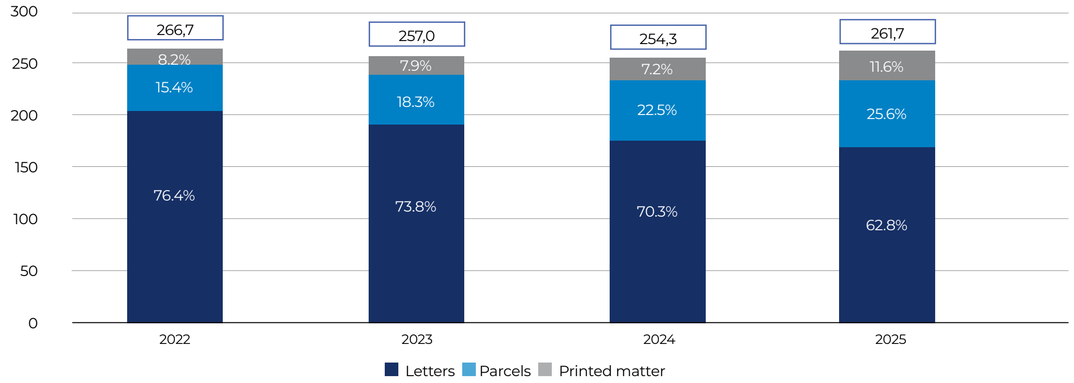


Figure 25. Number and shares of postal items by type (in million)

4.2.1 Universal service

Universal service is a set of different postal services in domestic and international traffic the provision of which is of special interest to the HR, and which needs to be available at an affordable price and under the same conditions to all postal services users throughout the HR territory. The only provider of universal service in the HR is HP, which has acquired the right and obligation to provide this service pursuant to the PSA

In 2025, 107.2 million services were performed within the scope of universal service, a decrease of around 7 percent from the previous year. The decline in the volume was continuous, with a reduction of 27.1 million services recorded between 2022 and 2025. The structure of the universal service remains stable, with letter items making up the largest share, followed by registered items, while parcels and other types of services within universal service have significantly smaller shares.

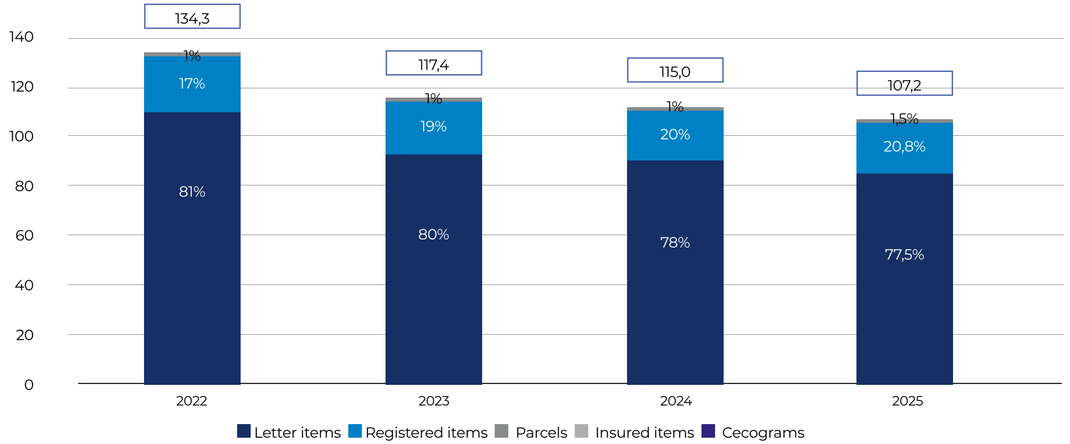


Figure 26. Total number of services within the scope of universal service by type (in million)

The share of universal service in the total volume of postal services was at a historic low of 40.9 per cent. Despite a reduction in the number of services delivered, revenues did not follow suit, but instead increased, amounting to approximately EUR 132.9m. The higher revenues resulted from price adjustments for certain services within the universal service scope.

Some services within the scope of universal service were provided, in addition to by the universal service provider, by 7 other providers through **interchangeable postal services**[6]. With around 49 million services provided during 2025, this segment of the postal market recorded a decline of 8.2 percent from the previous year, continuing the trend. This reduced the share of interchangeable postal services in the overall market to 18.7 percent, while revenues reached EUR 25.2m.

4.2.2 Other postal services

The segment of other postal services comprises services outside the scope of universal service and interchangeable postal service, primarily including parcels with some added value[7], such as express items, printed matter and direct mail[8]. This market segment is characterised by the greatest dynamism and strong growth in both volume and revenue.

In 2025, a total of 105.5 million of other postal services were provided, representing an increase of 22.9 percent from the previous year. The increase in volume raised the market share of these services to 40.3 percent. The largest share, 62 percent, is accounted for by parcel services, which dominated among other postal services, while the share of printed matter also increased.

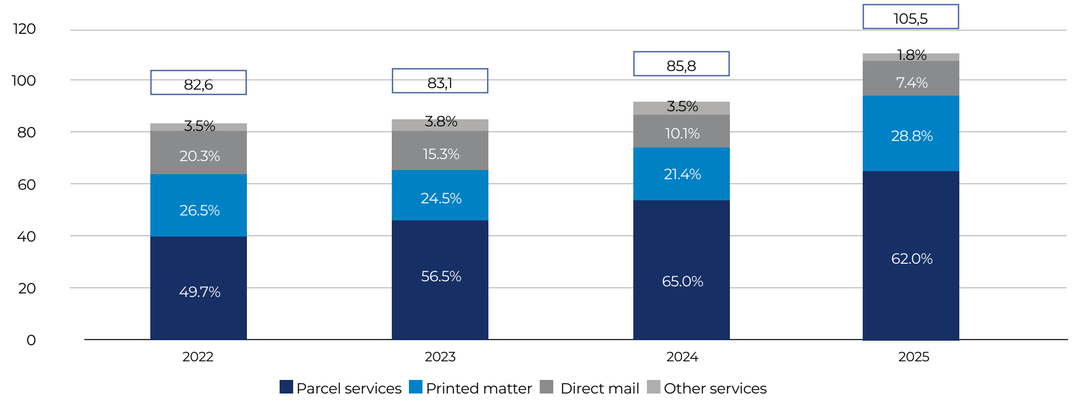


Figure 27. Total number of other postal services with shares by type (in million)

6 Postal services from the scope of universal service, which may deviate from the conditions of universal service, such as the obligation of daily delivery or the obligation to provide services in the entire territory of the country, but may from the user standpoint be viewed as being within the scope of universal service because they are sufficiently interchangeable with universal service.
7 Added value means clearing items when called by users, enabling tracking, observing contracted delivery times, etc.
8 Direct mail – a postal item consisting solely of advertising, marketing or publicity material and comprising an identical message, except the addressee's name, address, and identification number, as well as other modifications that do not change the nature of the message, which is sent in at least 500 copies.

In 2025, the revenues of a large number of other services increased by 17 percent, totalling EUR 247,8m. This growth of almost EUR 36.2m further strengthened the position of other postal services, which generate approximately 61 percent of total revenues in the entire postal market. Package services are of particular importance, as, despite accounting for 25 per cent of the total number of services provided, they generate a dominant 58 percent of total revenues.

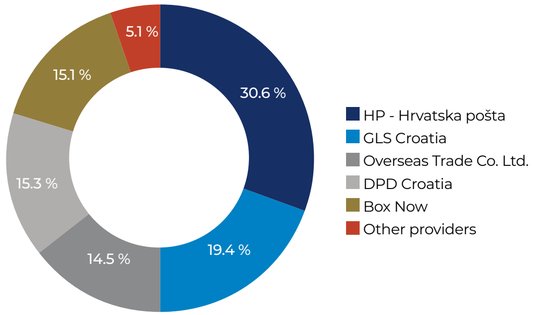


Figure 28. Providers' shares by the number of realised parcel services within the scope of other postal services

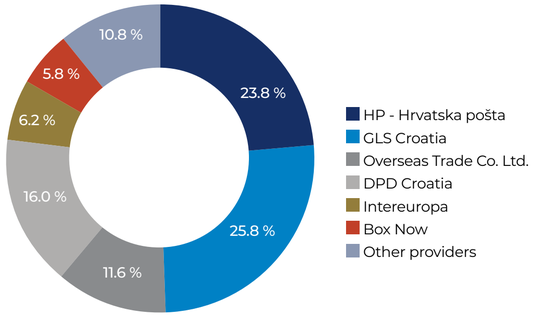


Figure 29. Providers' shares by revenues from parcel services within the scope of other postal services

4.3 QUALITY OF UNIVERSAL SERVICE

A significant part of regulatory activities was directed at supervising and monitoring the quality of universal service provision with a special emphasis on meeting the prescribed quality criteria.

The quality of the universal service provision is one of the key elements of consumer protection and a common objective of all EU Member States.

The quality measurement method and the criteria that the universal service provider must meet in domestic and international traffic are laid down in the PSA and the relevant Ordinance. The quality monitoring system is based on two key indicators:
– the transit time for postal items from clearance to delivery,
– the number of user complaints and compensation claims paid.

Quality measurements are carried out in accordance with the prescribed standards, and the universal service provider is obliged to submit
to HAKOM an annual Report on the quality of provision of universal service, based on the results of measurements performed.

Transit times for postal items in 2025

According to the data in the 2025 Report, HP conducted measurements of the transit times for priority letter items in international traffic through two systems. One measurement was carried out within the Universal Postal Union (UPU) network with selected Member States, while the other was the UNEX measurement, which is coordinated by the International Postal Corporation (IPC) and covers EU member states.

The results of the UNEX measurement were in 2025 at the same level as in the previous year and the prescribed quality criteria for international traffic were not met: 25.6 percent of priority letters were delivered within the D+3 time limit and 59,8 percent within the D+5 time limit. EU-wide analyses indicate that similar challenges in meeting the prescribed deadlines are also recorded in some other Member States.

Unlike the measurements in international traffic, quality measurements in domestic traffic carried out in 2025 showed significantly more favourable results. HP met all the prescribed quality criteria for all categories of letter items: 85.4 percent of priority items were delivered within the D+1 time limit, while 96.1 percent of items were delivered within the D+2 time limit. As for non-priority letter items, 95.2 percent of them were delivered within the D+3 time limit.

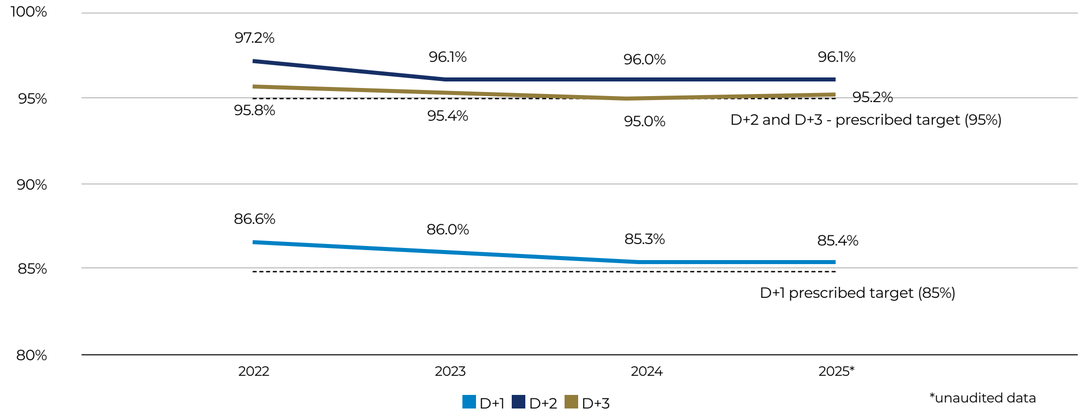


Figure 30. Measuring the quality of universal service in domestic traffic

Complaints and compensation claims

Data on user complaints and compensation claims in 2025 show an increase in the number of complaints received compared with the previous year. HP received a total of 47,482 complaints over the provision of universal service, which is an increase of approximately 17 percent from the previous year. Most complaints concerned services in domestic postal traffic and the main reasons for lodging them remained unchanged from before, mostly concerning non-compliance with prescribed delivery deadlines and the loss of postal items.

Despite the increased number of complaints received, HP maintained a high level of efficiency by resolving around 96 per cent of all cases on schedule.

4.4 ACCESS TO AND THE USE OF INFRASTRUCTURE

The universal postal service provider is obliged to establish, maintain and develop the postal network throughout the HR territory in order to ensure the accessibility of universal service in accordance with the PSA and the relevant ordinance, which prescribe the minimum density of access points and the requirements regarding the availability and working hours of postal offices.

4.4.1 Network and universal service availability

During 2025, HP implemented certain organisational changes within its postal network, including the relocation of some postal offices with the aim of improving working conditions and increasing availability and accessibility. As part of these activities, certain postal offices that had previously been closed were reopened and after a long time the network was further expanded with the opening of a new postal office. At the same time, in order to adapt to customer needs and streamline operations, working hours at some postal offices were also adjusted.

HAKOM carried out a control of all changes and established compliance with the prescribed standards, including the prescribed network density and service availability. The analyses carried out confirmed that the network density and service availability comply with the PSA. After a prolonged period without new postal offices, the total number of offices in the Republic of Croatia increased by one. At the end of 2025 there were a total of 1,017 postal offices.

Access to the universal service provider's postal network must be granted transparently and without discrimination to other postal service providers, consolidators and postal service users. HAKOM's analysis determined that the prices for access to the postal network had been set in accordance with the applicable regulatory framework.

4.4.2 Parcel lockers and delivery points

Alongside the network of postal offices, alternative access points – including parcel lockers and other locations for the delivery of postal items – have played an increasingly important role in the availability of postal services in recent years. These forms of access contribute to a more flexible use of postal services and better adaptation to changing user habits, particularly in the parcel segment.

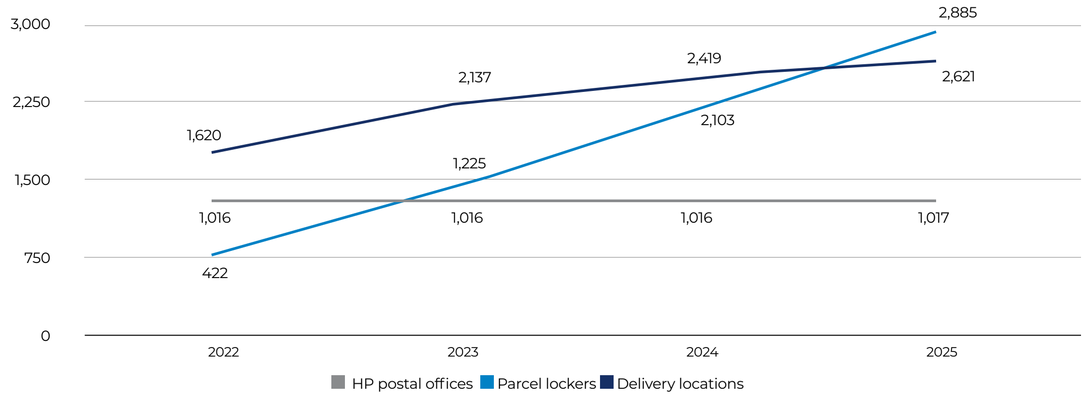


Figure 31. Trends in the number of HP offices and other delivery locations and parcel lockers of all providers

The network of facilities and alternative delivery locations continued to develop. The total number of facilities, including all postal offices and delivery locations in the HR, increased to 3,638 or by 5.9 percent. Of particular note is the strong growth in the network of parcel lockers, which numbered 2,885 at the end of 2025, representing a 37.2 per cent increase from the previous year.

4.5 REALISATION OF PLANNED ACTIVITIES

Price cap for the period from 2023 to 2025

In accordance with the Decision on the allowed price cap of January 2023 and the Decision on increasing the weighted price of the universal service basket, adopted in October 2024 and applying until 31 December 2025, during the year HAKOM carried out a regular analysis and review of deviations between actual and planned values for key parameters.

The analysis carried out confirmed that the deviations in the actual values of the key parameters were within the permitted limits of ±10 per cent; consequently, there was no need to adjust the price cap or to adopt a new decision.

Methodology for the regulation of universal service prices

In line with its planned activities, HAKOM launched a project in March 2025 to develop a new Methodology for the regulation of prices of universal service, with the aim of reviewing and adapting the existing price regulation model to the changed market conditions.

As part of the project, a regulatory impact assessment (RIA) was carried out, on the basis of which the process of drafting a new Methodology was initiated. The new Methodology involves shortening the regulatory cycle to one year, extending the scope of regulation to all services within the universal service domain and introducing additional parameters for calculating the allowed price cap.

The draft Methodology was submitted for public consultation for a period of 30 days, during which no comments were received from the public, after which the Methodology was adopted.

Decision on the maximum allowed percentage price increase for 2026

Following the adoption of the Methodology for the regulation of prices of universal service, in 2025 HAKOM conducted a procedure to determine the maximum allowed percentage increase in universal service prices for the regulatory period from 1 January to 31 December 2026, for all services from the scope of universal service subject to regulation.

Based on data provided by the universal service provider and publicly available macroeconomic indicators, the Council of HAKOM adopted a Decision setting the maximum allowed percentage price increase at 20.32 percent for the said regulatory period.

In accordance with the PSA, the universal service provider is obliged to submit a new price list to HAKOM before the start of its implementation, and HAKOM will verify its compliance with the adopted Decision and the applicable Methodology.

Accounting separation (Regulatory Financial Statement)

In accordance with the obligations prescribed by the PSA, the universal service provider in June 2025 submitted to HAKOM the Regulatory Financial Statement for 2024, prepared in accordance with the applicable Instructions on accounting separation and cost accounting of the universal service provider.

HAKOM conducted a procedure to verify the correctness of the separation of revenues and expenses of the universal service provider, which included an independent audit of the submitted Report. The audit confirmed that the Regulatory Financial Statement was prepared in accordance with statutory and subordinate legislation and in compliance with International Financial Reporting Standards.

After the audit, HAKOM issued a Statement of compliance of the methodology of accounting separation by Hrvatska pošta, confirming that the 2024 RFS complied with the prescribed requirements.

Universal service provider’s net cost

Pursuant to the provisions of the PSA, if the obligation to provide universal service generates net cost which constitutes unfair financial burden on the universal service provider, the universal service provider is entitled to the reimbursement from the state budget. In July 2025, the universal service provider HP submitted to HAKOM a Request for the reimbursement of the universal service net cost for 2024. The Request presents the business result achieved under the obligation of the universal service provision against the scenario without such an obligation. HP estimated the net cost of the universal service for 2024 at EUR 20,960,809.

Pursuant to the PSA and the Instructions on the calculation and reimbursement of the net cost of universal service, HAKOM carried out a detailed calculation verification procedure. Following the analysis and the necessary corrections, it was found that all the conditions for establishing that the net cost represented an unfair financial burden for the universal service provider were

met. The Council of HAKOM adopted a Decision setting the net cost for 2024 at EUR 14,924,499. This amount is EUR 6,036,310 lower than the initial amount stated in the HP's request.

Universal service prices

In 2025, within the scope of its statutory responsibilities, HAKOM monitored and regulated the prices of universal postal service to ensure the conformity of those prices with the provisions of the PSA and the guidelines of the EU Postal Directive.

These activities included monitoring and analysing changes in the prices of services from the regulated universal service basket. The monitoring covered the prices of letters of up to 50 grams and registered items of up to 50 grams in domestic traffic, which will apply from 1 January 2025 as well as the prices of the service of court documents and administrative and tax proceedings documents in all weight categories, including the corresponding additional return receipt service. During 2025, regulatory activities related to prices in international traffic were also carried out, in view of the reorganisation of the zone structure for parcel deliveries. Within this framework, a compliance check was carried out on the price adjustments that accompanied the introduction of the new zonal structure, as well as on the changes to letter service prices in international traffic.

In addition, throughout the year HAKOM monitored the application of prices in the contracts that the universal service provider entered into with large customers, for both universal service and alternative postal services, with the aim of preventing the abuse of a dominant position, ensuring fair market competition and protecting competition.

Network access

HAKOM, after receiving the HP's price list, carried out a detailed review and analysis to determine whether the prices for access to the postal network had been set in accordance with the prescribed principles and aligned with the provisions of the Ordinance. It was found that all prices were compliant.

Regulation on cross-border parcel delivery

In 2025, HAKOM continued to carry out the activities prescribed by Regulation (EU) 2018/644 on cross-border parcel delivery services, within the scope of its competence as the national regulatory authority for the implementation of the Regulation in the Republic of Croatia. The implementation of these activities contributes to the functioning of the single European market, particularly by removing barriers in cross-border postal delivery and encouraging the development of e-commerce.

During the year, in accordance with the Regulation, HAKOM collected data from postal service providers on the revenues, volumes of postal items, number of employees and prices of individual services. The collected and processed data were submitted to the European Commission within the prescribed deadlines

In accordance with Article 6 of the Regulation, a procedure was also carried out to assess cross-border single-piece parcel tariffs charged by universal service providers. The analysis, based on publicly available prices and a comparison with other Member States, showed that the cross-border tariffs do not differ significantly from comparable prices in the EU.

When assessing the tariffs, the specifics of the national market were also taken into account, including traffic volumes and transport costs, particularly in international parcel traffic. Based on the analysis carried out, it was determined that the observed prices are not considered unjustifiably high.

The results of the analysis were submitted to the European Commission, which publishes them on its official website, so that HAKOM fulfilled all its obligations pursuant to the Regulation.

Monitoring and analysing the conditions and development of the postal services market

In 2025, within the scope of its statutory competence, HAKOM continuously monitored and analysed the condition and development of the postal services market in the HR, regularly collecting statistical, financial and other data submitted by postal service providers on a quarterly and annual basis. The collected data were processed and used for analyses that informed HAKOM's regulatory decisions and reporting on market condition.

The collected data were also used to comply with the requirements of international authorities competent for monitoring the postal market including the EC, ERGP and the UPU. This ensures transparency and the comparability of national markets at the European and international levels. The data were also used for the purposes of government bodies and to respond to enquiries from the public and market participants.

The most important indicators on market developments were regularly published on the HAKOM's website. An updated list of registered postal service providers is available to the public, while HAKOM continuously maintains and updates the registry of postal service providers.

A particular emphasis was placed during the year on enhanced supervision of entities in the e-commerce sector in order to determine whether certain companies were carrying out activities that by their nature fall within the domain of postal services, thereby ensuring a level playing field and compliance with the regulatory framework.

Other regulatory activities and tasks

In 2025, within the scope of its statutory competence and pursuant to its Annual Work Programme, HAKOM conducted a series of other regulatory activities in the postal services market. The activities included processing complaints from postal service providers and supervising the compliance of amendments to the general terms and conditions and price lists with the provisions of the Postal Services Act.

To ensure the uniform and consistent application of the regulatory framework in the market, HAKOM issued expert opinions and explanations during the year concerning the application of the PSA and the relevant subordinate regulation. In addition, supervision of the delivery of postal items within the universal service obligation was also carried out, including through supervision inspections and the analysis of submitted exemptions from the prescribed delivery obligation.

In November 2025, the expert conference Day of Postal Services Market was held in Zagreb, dedicated to the current issues of the development of the postal market. The event brought together representatives of the competent authorities, regulatory institutions, professional and academic communities, consumer protection associations and postal service providers, with the aim of their exchanging experiences and discussing market trends, technological developments and regulatory challenges at the national and European levels.

In order to protect the rights of postal service users, HAKOM ensured the availability of information throughout 2025 via various communication channels, including telephone and electronic enquiries, as well as online tools. HAKOM's experts also participated in public discussions and informational activities in cooperation with consumer protection associations and other stakeholders.

In the second half of 2025, HAKOM conducted a survey of the satisfaction and needs of postal service users in the HR. The purpose of the research was to systematically monitor user habits and to analyse satisfaction with prices, delivery deadlines and the overall quality of postal services in the HR. In addition to providing insight into the use of HP's services as the universal service provider, the survey also covered the use of services from all other providers on the market. The results of the survey were used as a basis for monitoring the state of the market and for further regulatory activities.

HAKOM's activities in the postal services market in 2025

No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Financial Plan	Realised outcome	Implementation assessment and recommendations
1.	4.2	Analyse the organisation of the postal network, model and simulate new solutions	Amendments to the Ordinance on the provision of universal service	II	N	Internal analysis carried out and proposal for the new organisation presented to the MSTI and HP	Achieved
2.	4.1, 1.1	Collect and process data on the postal services market	Reports on postal services market indicators	Quarterly	N	4 reports on postal services market indicators published	Achieved
3.	2.1, 2.2	Meet the requirements pursuant to the Regulation on cross-border parcel delivery services	Data submitted to EC bodies	III/III	N	Data collected, processed and published	Achieved
4.	1.3	Control the fulfilment of universal service obligation	Verified delivery, postal network density, postal offices' working hours, etc.	Ongoing	N	Compliance of the Decision on the relocation of postal offices and the Decision on the working hours of postal offices with the Ordinance verified	Achieved

5.	1.3	Analyse the five-day delivery obligation	Review of the conditions related to the five-day delivery	III/III	N	Non-compliance with delivery deadlines verified pursuant to the Ordinance on the provision of universal service	Achieved
6.	1.3	Define price cap for a part of universal service in the medium term	Decision on the price cap for the period 2026 – 2028	IV/IV	N	Methodology for the regulation of prices of universal service adopted Decision on the allowed price cap adopted	Achieved
7.	1.3.1.3	Control the calculation of the price cap for a part of universal service	Verified key parameters that influence the price cap and price adjustment	I and III/I and III	N	2 internal analyses carried out	Achieved
8.	1.3	Monitor and analyse prices and discounts for universal service	Affordable and cost-oriented prices for all users	Ongoing	N	2 internal analyses carried out	Achieved
9.	1.1	Monitor and analyse prices and discounts for interchangeable postal services	Application of prices in accordance with the postal services price list	Ongoing	N	2 internal analyses carried out	Achieved
10.	1.1	Control the conditions and prices of access to the universal service provider's postal network	Access to the universal service provider's postal network enabled to all users under equal conditions	Ongoing	N	HP's price list on network access harmonised with regulations	Achieved
11.	1.1	Resolve regulatory disputes	HAKOM's decisions	Ongoing	N	There were no disputes	Achieved

12.	2.3	Review the obligations of all postal services providers	Verified providers' registrations/ removals, logbook keeping, general terms and conditions, price list, status changes, etc	Ongoing	N	8 general terms and conditions and 5 providers' price lists harmonised 1 new provider registered	Achieved
13.	1.1	Monitor the impact of e-trade and digitalisation on the postal services market and the emergence of new postal services provision methods	Registration of new postal services providers and new services; equal conditions created for all market stakeholders	Ongoing	N	Emergence of new services in the market	Achieved
14.	1.2	Supervise the implementation of accounting separation	RFS audit Compliance statement	III/III	N, 3237	HP' RFS audit performed and Compliance statement adopted	Achieved
15.	2.2	Establish the unfair financial burden on the universal service provider (net cost)	Revision of requests for the reimbursement of net costs Decision on the net cost amount	IV/IV	N, 3237	Audit performed and Decision adopted	Achieved
16.	4.1	Analyse the Report on the quality of provision of universal service	Revised Report and corrective measures	III/III	N, 3237	Audit carried out	Achieved
17.	4.1	Reply to inquiries and submissions of users and other postal market stakeholders	Replies to users and other stakeholders	Ongoing	N	Replies made to 528 inquiries and submissions from postal services users	Achieved
18.	3.1	Organise a conference with postal market stakeholders	Conference held	IV	N, 3235	Day of Postal Services Market held	Achieved
19.	3.2	Survey of satisfaction and needs of postal services users	Results and indicators of users' satisfaction and needs	III	N, 3237	Survey carried out and results published	Achieved

5

RAIL SERVICES



5.1 MARKET OVERVIEW

In 2025, the rail services market in the Republic of Croatia functioned in an environment of pronounced operational challenges, primarily due to extensive infrastructure works on the rail network. At the same time, the network constraints of Croatian lines remain significant, as only 10.5 percent have two or more tracks, which limits traffic capacity, slows down traffic and increases susceptibility to delays.

Railway passenger transport continued the positive trends from previous periods, while railway freight transport underwent an adjustment marked by unfavourable economic circumstances and frequent track closures, resulting in a decrease in total goods transported.

Basic market indicators

The total length of tracks of 2,617 km did not change, with the share of multi-track lines remaining well below the EU average, which currently stands at 40.8 percent and is growing. Despite the infrastructure works that took place throughout the year, the number of passengers carried in 2025 increased by 7.3 percent compared to the previous year, but, on average, on shorter routes. The amount of goods transported decreased by 14.6 percent.

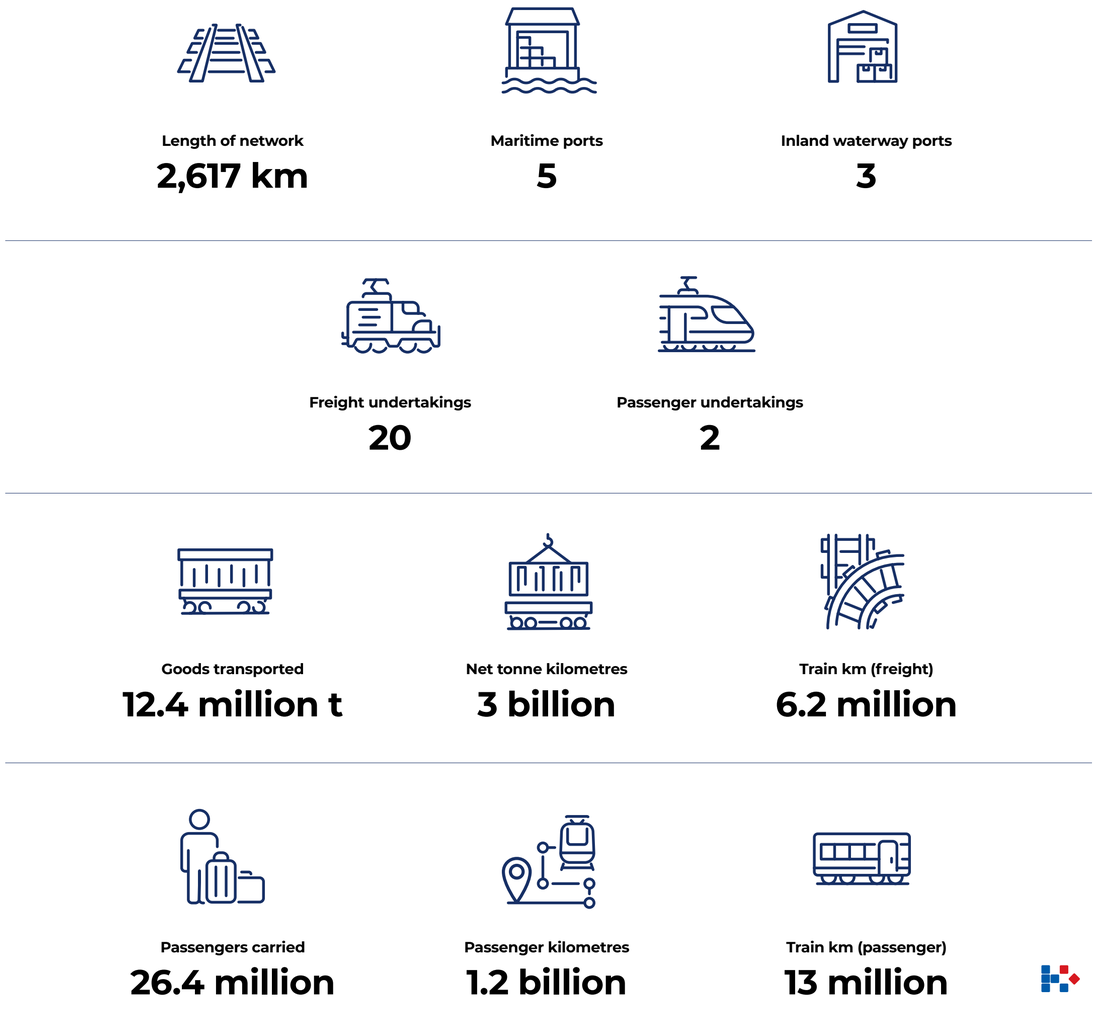


Figure 32. Basic indicators of the railway services market

Market structure and stakeholders

Both passenger and freight railway undertakings operate in the rail services market in the HR, while railway infrastructure is managed by one infrastructure manager. Such a market structure requires a clear delineation of roles and transparent conditions for access to infrastructure and related services for all market participants.

The infrastructure manager, HŽ infrastruktura d.o.o. (HŽI), has a central role in the functioning of the railway system and is, at the same time, the largest service facilities operator in the rail services market in the HR. When it comes to the transport of passenger and goods, in addition to the passenger incumbent HŽ Putnički prijevoz d.o.o. (HŽPP), Rail Cargo Carrier-Croatia d.o.o. also holds a licence to operate rail passenger transport services, while in the freight rail transport market there are a total of 20 registered undertakings, of which two new undertakings were registered in 2025: ENNA LOGIC d.o.o. and Grampet Rail d.o.o. Six undertakings did not provide freight transport services in 2025.

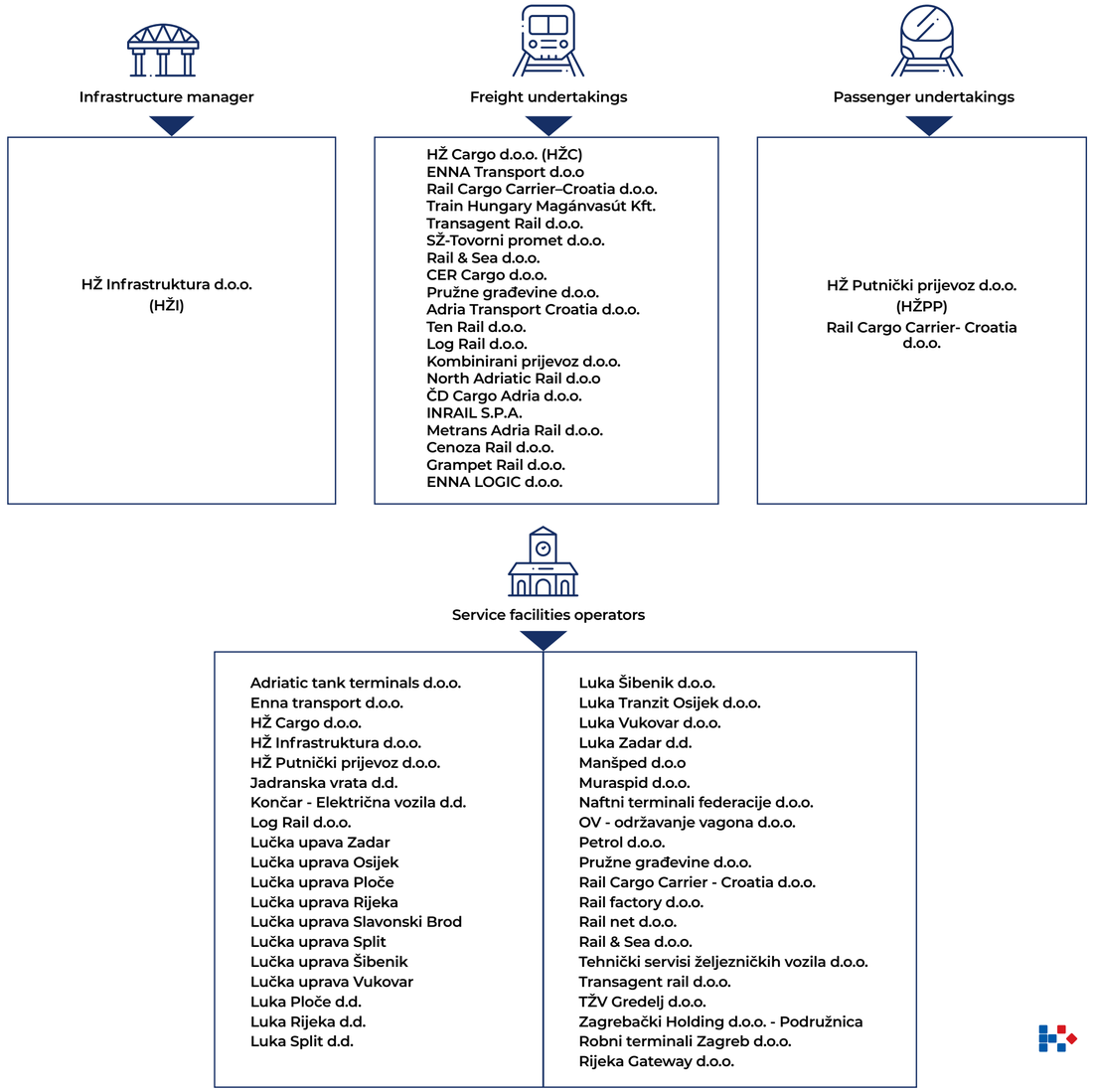


Figure 33. Stakeholders in the rail services market

5.2 RAIL SERVICES

5.2.1 Freight transport

In 2025, there was a decrease in activity in rail freight transport. The rail network transported a total of 12.4 million tonnes of goods, which is 14.6 percent less than in the previous year. In the structure of the market, the incumbent HŽ Cargo d.o.o. (HŽC) increased its share in the total quantity of goods transported by 0.4 percentage points compared to new undertakings, now totalling 41.5 percent.

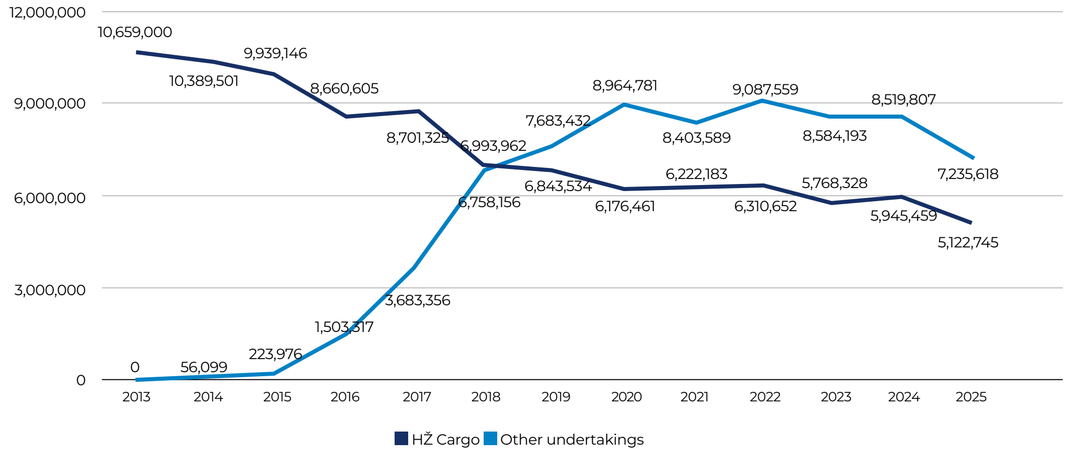


Figure 34. Transported goods (in tonnes)

In the same period, the number of total realised tonne-kilometres of all freight undertakings decreased as well, by 8.6 percent from 2024. New undertakings registered a 4.8 percent fall in realised tonne-kilometres, while the incumbent HŽC registered a fall of 12.4 percent.

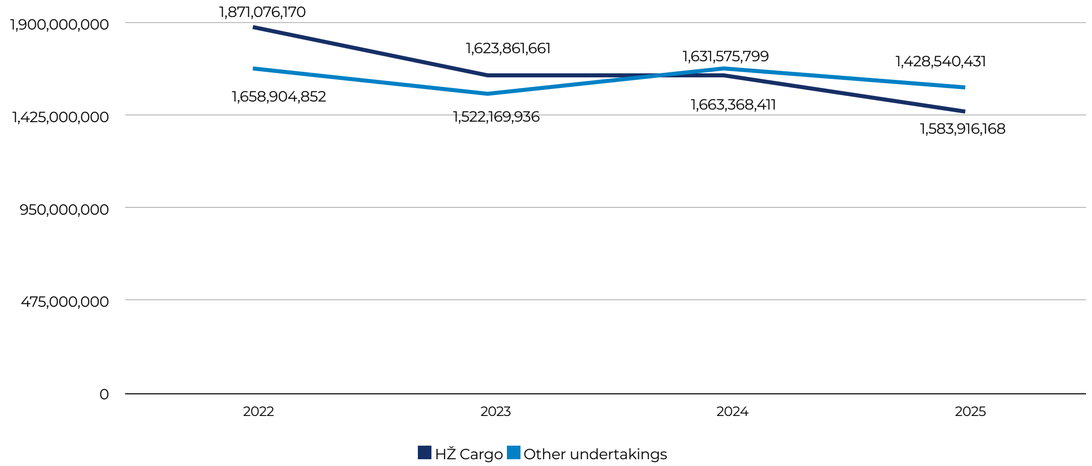


Figure 35. Realised tonne-kilometres

Revenues of freight undertakings also decreased by 4.6 percent and amounted to EUR 114.7 million. In the freight transport market, seven freight undertakings account for individual shares of more than 2 percent of total revenues. The remaining thirteen freight undertakings have individual shares below 2 percent, with their combined share totalling 4.7 percent of total revenues. The incumbent HŽC continues to account for the largest individual share of total revenues from the transport of goods.

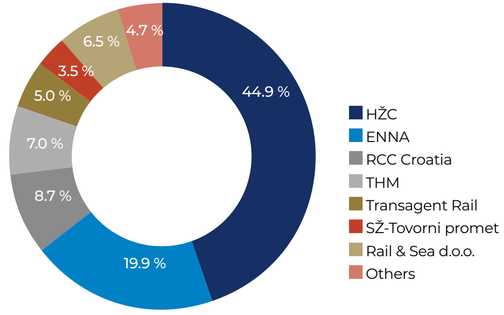


Figure 36. Revenue shares of freight undertakings from total transport of goods

5.2.2 Passenger transport

Although two passenger undertakings have been registered in the railway market since 2023, only HŽPP provided the service of passenger transport in 2025. According to the data provided by HŽPP, the number of passengers carried increased by 7.3 percent in 2025 compared to the previous year.

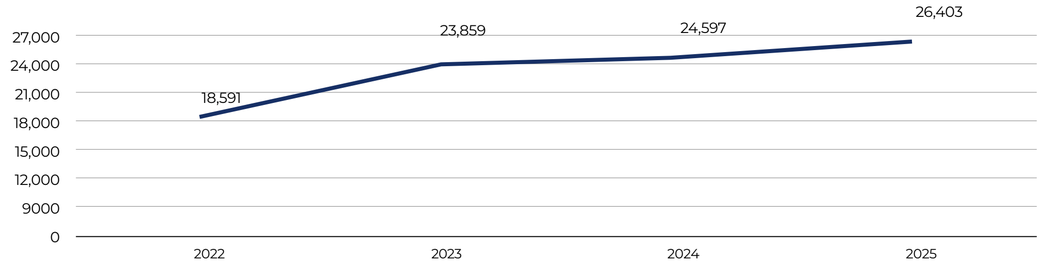


Figure 37. Number of transported passengers (in thousand)

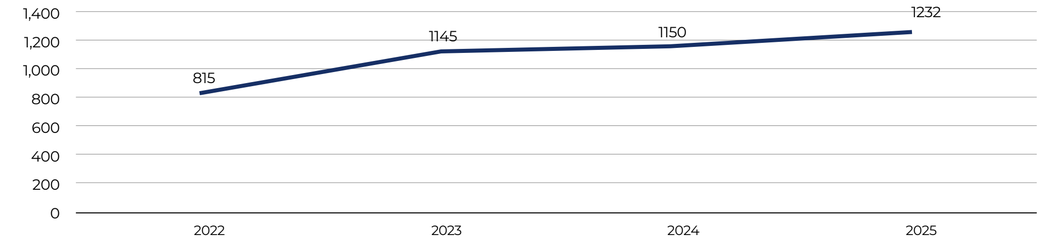


Figure 38. Passenger kilometres (in million)

5.2.3 Service facilities

Service facilities operators are legal persons responsible for operating one or more service facilities or facilities for the provision of one or more services to railway undertakings.

HŽI and other service facilities operators are obligated to ensure all interested railway undertakings that submitted the application the right of access to the railway infrastructure, as well as the use of tracks that connect maritime ports, inland waterway ports and other service facilities under equal, transparent and non-discriminatory terms. Information necessary for applicants providing transport services must be included in the Network Statement (NS), compiled by HŽI for every timetable.

As part of statutory requirements relating to the NS, HŽI updated and published a list of service facilities it operates, the services it provides and the associated charges. It thus complied with the requirement under the Commission Implementing Regulation (EU) 2017/2177 of 22 November 2017 on access to service facilities and rail-related services.

The Register of Railway Services of Service Facility Operators, established on HAKOM's website in accordance with the Railway Act, comprises basic, additional and ancillary services, and is kept up to date

5.2.4 Infrastructure manager – Minimum access package

The MAP is the most important service, provided by HŽ Infrastruktura and comprises the following services:

– thandling of requests for allocation of railway infrastructure capacity
– the right to utilise capacity which is granted and use of the railway infrastructure, including track points and junctions
– train control including signalling, regulation, dispatching and communication and provision of information on train movement
– use of available electrical supply equipment for traction current
– providing of all other information required to implement of operate the service for which capacity has been granted

The average price per train-kilometre for the use of the MAP in the HR in 2025 was EUR 0.89. However, the average amount of the charge per train-kilometres in freight transport was EUR 1.42, while the average amount in passenger transport was EUR 0.64. HŽI realises 76 percent of its revenues from public funds and 24 percent from railway undertakings.

5.3 QUALITY OF RAIL SERVICES

The RA prescribes that the system for setting charges for the use of the railway infrastructure must encourage railway undertakings and the infrastructure manager to reduce disturbances in railway traffic and improve the efficiency of the railway infrastructure by applying a system of quality indicators. For more detailed insight, HAKOM completed regular consultations with the representatives of users of rail freight transport services, as well as consultations with the representatives of users of rail passenger transport services.

Railway freight transport

Aiming to implement regulatory requirements, by its Decision of April 2023 HAKOM ordered the infrastructure manager, starting from the entry into force of the 2023/2024 timetable, to put in place and describe in detail a Performance Scheme indicators in accordance with Article 51 of the RA for all railway freight undertakings, and publish it in the NS. As part of the second amendments to the 2024 NS, the HŽI amended the previous chapter "5.7 Performance Scheme" thus finally establishing the Performance Scheme for all railway undertakings, including the system of resolving disputes in freight transport. This, for the first time, provided for the systemic monitoring of the quality of freight railway transport (including regular freight trains delayed by more than 90 minutes at their final official destination as compared to the arrival times scheduled in the timetable). The charge for the delay is EUR 0,10/min and the total amount of the delay charge of an individual train may climb up to 5 percent of the charge for the entire route of that train for each responsible party.

After the app displaying data in the system of quality indicators in the HŽI freight transport was set up, HAKOM has been regularly monitoring and analysing data available on HŽI's official website "Portal za pristup infrastrukturi" (Infrastructure Access Portal) for all railway undertakings covered by in the system. In addition to data on the times and causes of delays that are entered in the quality indicator system, including delays of freight trains at destinations, the analysis also included delays at departure, overall delays recorded, as well as data on train-kilometre outputs by weight classes and categories of freight trains.



Figure 39. Results of the analysis of the quality system of railway infrastructure

Railway passenger transport

HAKOM regularly monitors the number and type of complaints submitted by passengers to the railway passenger undertaking. An analysis established than in 2025, HŽPP received a total of 8,956 complaints of its passengers. Three categories make up most of all complaints (some 60 percent). Although delays are often the first association with railways, in terms of the number of complaints they constituted only the third reason for complaint, but still a very significant one. Most of the dissatisfaction voiced by passengers had to do with refunds and problems with ticket sales (ISPRO sales system). According to the analysis, passengers complained less about the cleanliness, timetable and technical conditions of trains.

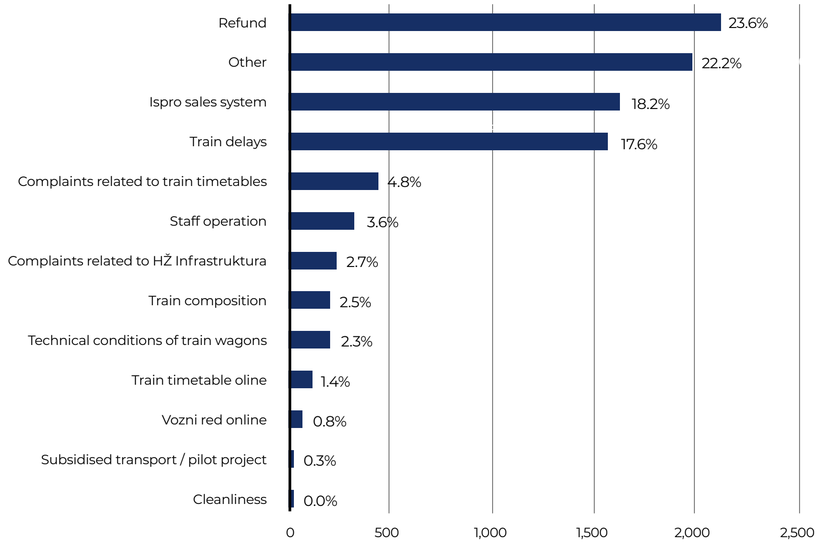


Figure 40. Types of passenger complaints

A review of the causes of train delays established a rising trend in secondary delays, which at the beginning of 2024 accounted for 42 percent of all delays and continued to grow uninterruptedly to exceed 60 percent by the end of 2025. This indicates that the system has difficulties handling primary train delays, causing a “domino effect” across the entire timetable. On the other hand, primary delays caused by the HŽI were reduced from a share of 39 percent at the beginning of 2024 to a share of 26 percent at the end of 2025. The share of primary delays of the HŽPP also reduced from 15 to 7 percent.

Starting from the 2023/2024 timetable the system of quality control indicators includes trains with the delay of more than 15 minutes at the official destination. At the end of 2025, such trains made up 15 percent of the number of all trains carrying passengers and their average delay was 35 minutes per train.

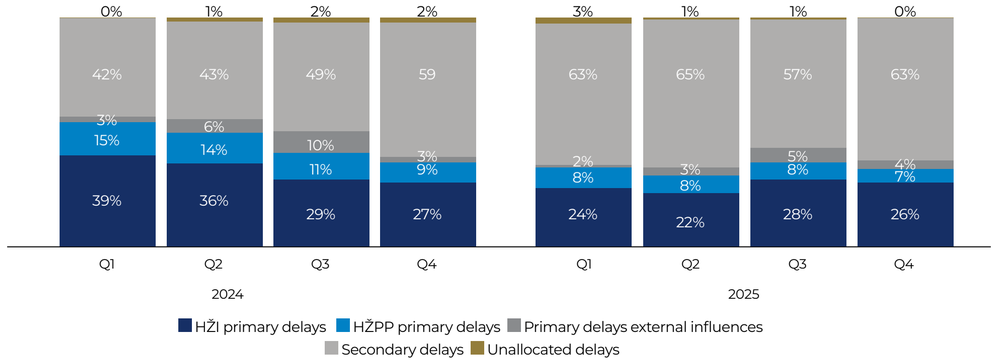


Figure 41. Shares of train delays by cause

5.4 ACCESS TO AND THE USE OF INFRASTRUCTURE

HŽI manages the 2,617 km long railway network in the HR, of which 2,341 km are single-track, and 276 km are double-track railway lines. In 2025, the length of electrified tracks was 1,013 km, which makes up 38.7 percent of the total railway network. Most of electrified tracks are powered by the alternating current system of electrification with 25 kV and 50 Hz, while a smaller part of the network is electrified with 3 kV DC power supply system. The electrification of the railway network in the HR continues to be below the EU average of 57 percent.

The use of railway infrastructure in 2025 is visible from the data on realised train-kilometres (tkm) in the railway network. According to collected data, railway undertakings altogether realised 3.5 percent tkm less than in the previous year. In freight transport, registered train kilometres were 6.5 lower than last year, while in passenger transport they were 1.9 percent lower.

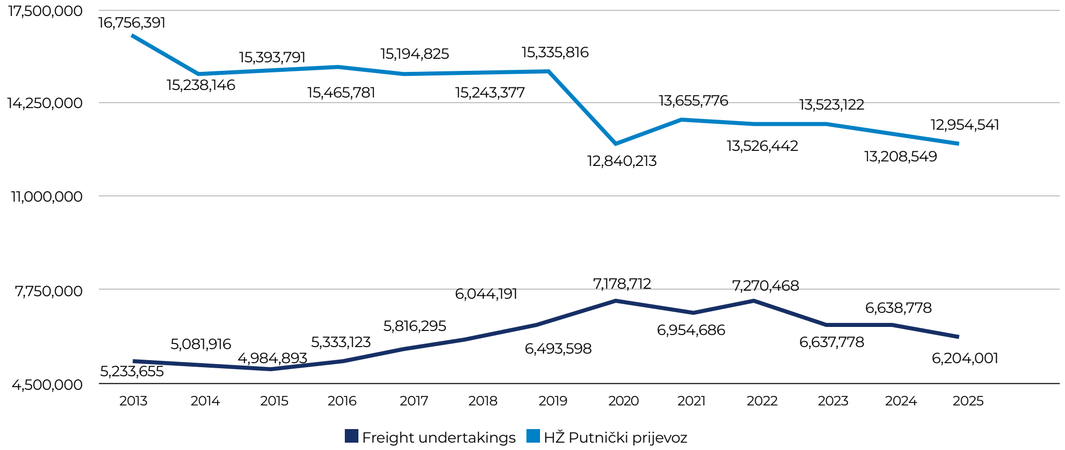


Figure 42. Train kilometres realised in railway freight and passenger transport

In the period under review, 20 undertakings were operating in the railway freight transport market, of which 7 realised individual shares in total train kilometres exceeding 2 percent, while the remaining 13 undertakings together accounted for a share of 6.6 percent. HŽC as the incumbent undertaking continued to account for the largest market share, expressed in tkm, while among the remaining freight undertakings, ENNA Transport d.o.o. and Rail Cargo Carrier d.o.o. realised the largest shares.

Revenues and charges of the infrastructure manager

The charges for rail services collected by the HŽI are related to the Minimum Access Package (MAP), access to service facilities and services provided at those facilities, including track access to those service facilities and additional and auxiliary services. For the use of the MAP and track access to service facilities railway undertakings sign an access agreement with the HŽI, while separate agreements are concluded for other railway services.

HŽI is independent in defining the methodology for setting charges. It publishes the terms and conditions of the access to the rail infrastructure and the terms and the prices for other railway services in the NS, in accordance with the provisions of the RA. HŽI and service facilities operators are independent in calculating the price for access to and usage of railway services, while HAKOM's role is to supervise the infrastructure manager and service facilities operators in relation to the setting of and the amount of these charges, as well as to check whether they are calculated in compliance with the methodology prescribed by the RA and the rules of the NS.

In the 2027 NS, the basic price of the MAP service was increased by 10 per cent for passenger transport and by 3 percent for freight transport compared to 2026, while the basic price for the use of the overhead contact line increased by 11 percent. Weight class equivalents, train path equivalents and line parameter amounts were slightly changed in the 2027 NS compared to the previously published NSs. The upward trend in basic prices of the MAP service continued, with the increase between 2023 and 2027 totalling 48% for freight transport and 35% for passenger transport. The increase in labour costs and direct costs of train traffic management were listed as the reason behind the increase. As for services provided at those facilities, amendments to the 2025 NS and the 2026 NS raised individual charges related to the electricity required for towing trains and altered the calculation methodology, including the introduction of the charge for electricity buyback. The draft 2027 NS has also included amendments to the methodology for calculating charges for train garaging and manoeuvring at service facilities.

In 2025, HŽI generated **revenues of EUR 20.2m** from all rail services, up 2.13 percent from the previous year. **Revenues from the MAP totalled EUR 17.1m**, an increase of 3.1 percent from the year before.

Revenues from the services of forming, disassembling and changing train compositions amounted to EUR 1.8m. Almost EUR 1m was generated from the use of passenger stations, station buildings and other facilities for the reception and dispatch of passengers. The remaining part of the revenue relates to the use of garage tracks, scales and manoeuvring services for weighing, assistance in running trains with exceptional consignments and facilities for cleaning freight wagons at the Zagreb train marshalling yard, Zagreb Ranžirni kolodvor.

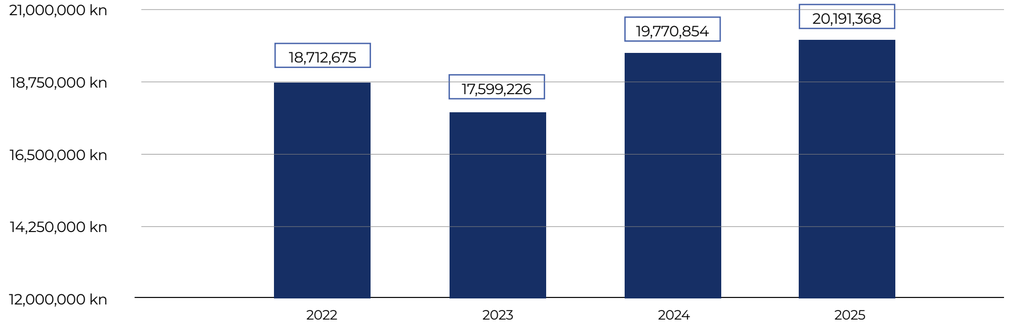


Figure 43. HŽI's revenues from railway services

5.5 REALISATION OF PLANNED ACTIVITIES

Network Statement

During the year, HAKOM verified the Network Statement (NS) of the railway infrastructure manager, the oversight covering NSs for 2025, 2026 and 2027 and their amendments.

HAKOM analysed the compliance of the NS with the applicable national and European regulations and alerted the infrastructure manager to the need to amend the disputed provisions, which has partially been completed and is ongoing. HAKOM thus indicated to the infrastructure manager the need to align the provisions of the NS relating to temporary capacity restrictions, to supplement it with the necessary information and to update it regularly in accordance with Commission Delegated Decision 2017/2075, Annex VII. Particular attention was paid to the MAP. The basic price of the MAP indicated in the 2027 NS for passenger transport was 10 percent higher and for freight transport 3 percent higher than the price indicated in the 2026 NS. The basic price for the use of the contact network was raised by 11 percent. Weight class equivalents, train path equivalents and line parameter amounts were changed slightly and the upward trend in the basic prices of the MAP continued, bringing the cumulative increase from the 2023 NS to the 2027 NS for freight transport to 48 percent and for passenger transport to 35 percent. The main reason behind the increase of the basic price and thus of the total charge for the MAP was the increase in the costs of labour, that is, the direct costs of train traffic management.

As part of the verification, HAKOM also checked the charges for railway services and services provided at service facilities. It is noteworthy here that it has come to changes in the methodology for formulating the price of electricity in the 2026 NS to include a new share of the charge – the electricity buyback fee. The portion of the charge for supplied electricity was changed in the same NS. The Draft 2027 NS also amended the methodology for calculating charges for sorting tracks and the calculation methodology for the charge for manoeuvring in service facilities.

Regulatory financial statements

HAKOM verified the compliance of the infrastructure manager HŽI, the freight transport incumbent HŽC and the undertaking for passenger transport HŽPP with the provisions on accounting separation. In 2025, all undertakings subject to the provisions submitted their regulatory financial statements in a timely manner as basis for verifying accounting separation.

Railway Services Market Day

In November, HAKOM organised the conference “Railway Services Market Day” as an event which gathers market stakeholders to exchange opinions. Two panel discussions were held as part of the event dedicated to the development of railway corridors and related challenges in the segments of transport and energy. It gathered representatives of the academia, experts in the fields of railway transport and energy, and stakeholders in the railway services market.

Oversight of service facilities

During the year HAKOM verified compliance of the descriptions of service facilities with the provisions of Commission Implementing Regulation (EU) 2017/2177 of 22 November 2017 on access to service facilities and rail-related services. As part of the oversight, HAKOM analysed the compliance of published descriptions of services facilities, especially in the part relating to the content of information on the conditions of services provision, charges and the manner of access. A random check of a sample of service facilities determined a high level of compliance with prescribed provisions, while established irregularities were primarily related to the publication of information on the amount of charges and discounts, and deadlines for replying to access applications. In these cases, HAKOM took appropriate measures and service facilities operators submitted supplements to the descriptions to be included in the Network Statement of the infrastructure manager.

Registry of rail services provided by service facilities operators

The registry of rail services provided by service facilities operators was regularly updated in accordance with applicable regulations. The register on HAKOM’s website is updated based on the data submitted by service facilities operators.

Additional activities

HAKOM’s representatives participated in the meeting of the Working Group on Access to Service Facilities (AtoSF) of the European Union Agency for Railways (ERA). The meeting was dedicated to the exchange of information on regulatory issues related to the Register of Infrastructure (RINF), the regulation of service facilities and access to infrastructure capacity and capacities in service facilities.

Within the framework of the survey on the implementation of Regulation (EU) 2021/782 on rail passengers’ rights and obligations, carried out for the European Commission by Milieu Consulting, HAKOM participated in the collection of information as a national enforcement body. The cooperation was implemented through communication with relevant stakeholders, participation in the completion of the written questionnaire and further clarifications obtained through interviews.

In 2025, HAKOM participated in the testing of the “Passenger Rights AI Watch Tool” launched by the European Commission’s Directorate-General for Mobility and Transport (DG MOVE) for national authorities responsible for implementing Regulation (EU) 2021/782. HAKOM’s participation

included feedback on the functionalities of the tool and the difficulties encountered during testing.

HAKOM participated in the activities of the working group for amending the Railway Carriage Contracts Act. The new Railway Carriage Contracts Act was published in the Official Gazette 37/2026.

During the year, HAKOM hosted students of the first year of the Faculty of Transport and Traffic Sciences of the University of Zagreb (FPZ) who attend the course on General Transport Law, with the aim of getting them acquainted with HAKOM's work and its organisation and presenting them examples of regulatory practice.

At the request of HŽI, HAKOM issued an expert opinion on the proposal to provide the train towing service on the route of Rijeka – Lokve. The opinion concerned the compatibility of the proposed solution with the provisions of the RA, in particular, with regards to the separation between the management of railway infrastructure and the provision of rail transport services. HŽI also requested an opinion on the impact of this decision on the market of railway services and rail transport services in the HR.

HAKOM's activities in the rail services market in 2025

No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Financial Plan	Realised outcome	Implementation assessment and recommendations
1.	2.1, 2.2, 4.2	Resolve regulatory disputes	HAKOM decisions	Ongoing	N	There were no disputes	Achieved
2.	3.1.	Provide opinion on the infrastructure manager business plan	Opinion provided	I/I	N	Opinion provided to HŽI	Achieved
3.	2.1, 2.2, 4.2	Supervise the implementation of the 2025 Network Statement and all amendments	Control – Publication of amendments to the Statement Regulatory compliance analysis	Ongoing	N	All planned activities completed	Achieved
4.	2.1, 2.2, 4.2.	Supervise the implementation of the 2026 Network Statement and all amendments	Control – Publication of amendments to the Statement Regulatory compliance analysis	Ongoing	N	All planned activities completed	Achieved
5.	2.1, 2.2, 4.2	Supervise the preparation, publishing and implementation of the 2027 Network Statement	Control – Publication of the draft – Publication of the Statement Regulatory compliance analysis	Ongoing	N	All planned activities completed	Achieved
6.	2.1, 2.2, 4.2	Control of compliance of Service Facilities Descriptions with Regulation 2017/2177	Analysis of compliance with the Regulation	Ongoing	N	Facts established and internal notes produced	Achieved
7.	4.2, 4.3	Keep the registry of rail services of service facility operators	Register operational and updated	Ongoing	N	Registry updated	Achieved
8.	4.2, 4.3	Control charges for rail services	Charges comply with regulations	Ongoing	N	Charges comply with regulations	Achieved
9.	4.2, 4.3	Analyse the calculation of charges for services provided in the service facilities of infrastructure managers	Analysis performed	IV/IV	N	Internal analysis performed	Achieved
10.	4.2, 4.3	Analyse regulatory financial statements	Report	Ongoing	N	Internal report created	Achieved
11.	4.3.	Supervise the rail services market – transparent and non-discriminatory conditions for the provision of services	Non-discriminatory and transparent conditions for access to the network and service facilities	Ongoing	N	All planned activities completed	Achieved

12.	2.1	Collect and process data on the rail services market condition focusing on the infrastructure manager	Quarterly and annual data analysis	Quarterly and annually	N	Four reports on indicators of the rail services market published	Achieved
			Data disclosure			Data disclosed	
13.	4.3	Reporting to the EC and MSTI within the framework of rail market supervision	Report timely submitted and complete	IV/IV	N	Report submitted to the EC and the MSTI	Achieved
14.	4.3	Organise a conference with rail market stakeholders	Conference organised	IV/IV	N, 3235	Railway Services Market Day held	Achieved
15.	1.3	Conduct consultations with the users of rail freight transport	Analysis of the consultations performed and published	I/I	N	Completed and published analysis of the consultations	Achieved

6

CONSUMER PROTECTION



The protection of the rights of users and passengers in all areas of its competence is one of HAKOM's core tasks. In accordance with the applicable legal framework, HAKOM carries out regulatory, supervisory and advisory activities aimed at ensuring high levels of protection of end users of electronic communications, postal and railway services.
This chapter provides an overview of activities and results in the area of user and passenger protection in 2025, with the focus on informing and educating users, resolving disputes and complaints, regulatory mechanisms and tools, and cooperating with relevant stakeholders.
The overview is structured by individual markets – electronic communications, postal services and rail services – followed by an overview of accessibility-oriented activities and the realisation of planned activities in line with HAKOM's Annual Work Programme.

6.1 ELECTRONIC COMMUNICATIONS

In the segment of electronic communications, HAKOM protects users through regulatory activities and activities of providing information which are directed at ensuring transparent conditions for the use of services and an efficient mechanism of protecting the rights of end users. The system of user protection in 2025 included various activities of providing information and educating users (via official websites and the "Ask Us" app, through provision of digital and printed informative materials, including leaflets and brochures, training and workshops related to the protection of children in a digital environment and the development and maintenance of regulatory tools for helping users: HAKOMetar, HAKOMetar plus, Cost Estimator and Do Not Call Register. Special attention was awarded to the protection of children, with detailed descriptions of completed activities to be found at the end of the chapter under the title Realisation of planned activities.

A further step forward in the protection of all vulnerable user groups identified under law was made in September 2025 with the establishment of three advisory mechanisms to improve the provision of services in electronic communications: the Advisory Mechanism for the Protection of Children in the Digital Environment, the Advisory Mechanism for the Protection of Older Persons in the Digital Environment and the Advisory Mechanism for the Protection of Persons with Disabilities in the Digital Environment. The operation of these mechanisms gathers associations, institutions, academia, operators and end users.

Disputes

One of HAKOM's key activities in the protection of users, the one that enables users to solve their problems with operators without incurring costs or initiating court proceedings, is dispute resolution between users and operators. In 2025, 833 disputes were resolved, which is an increase of 16.5 percent compared with 2024. This points to increased activity of users in the protection of their rights and greater awareness of the possibility of institutionalised dispute resolution before HAKOM because the share of decisions in cases where the operator was in the wrong decreased in 2025.

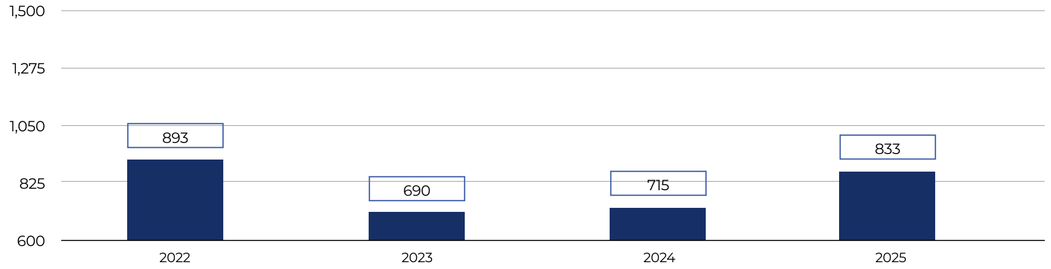


Figure 44. Number of disputes in electronic communications from 2022 to 2025

Of a total of 833 disputes between operators and users in 2025, 559 were resolved by a HAKOM's decision. The ratio of decisions in which HAKOM confirmed the second instance decision of an operator to decisions in which they were not confirmed is a measure of correct treatment by operators. Namely, in cases when operators' services and their consumer complaint commissions proceed in accordance with the regulatory framework, HAKOM's decision in the dispute is negative for the user, i.e. HAKOM confirms the decision reached by the operator. In 2025, 14.5 percent of decisions were positive for the user, while in the previous year this share was 26.6 percent, which indicates an improvement in the work of operators' services in resolving user objections and complaints.

As for other disputes between operators and users in 2025, 274 of them were resolved by adopting a decision on dismissal or termination without the need to deliberate the merits of the case. In 2025, it did not come to a significant change in the number of such decisions compared to 2024. The decisions on termination were predominantly reached because the operator subsequently, after the end user turned to HAKOM, changed its initial decision adopted when resolving the complaint and the end user raised no objections. The decisions on dismissal were predominantly adopted when HAKOM was not competent for dispute resolution.

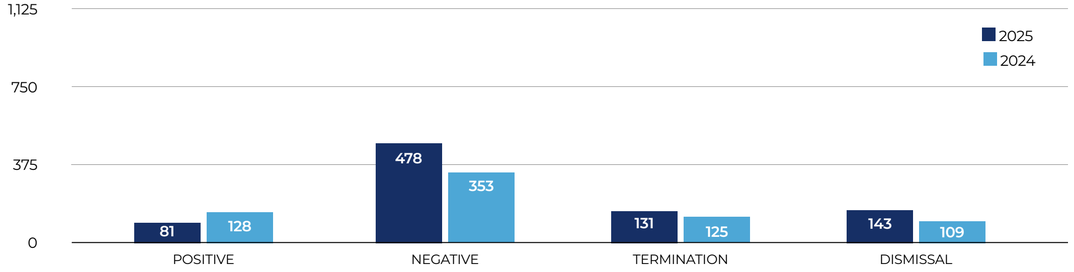


Figure 45. Disputes by type in 2024 and 2025

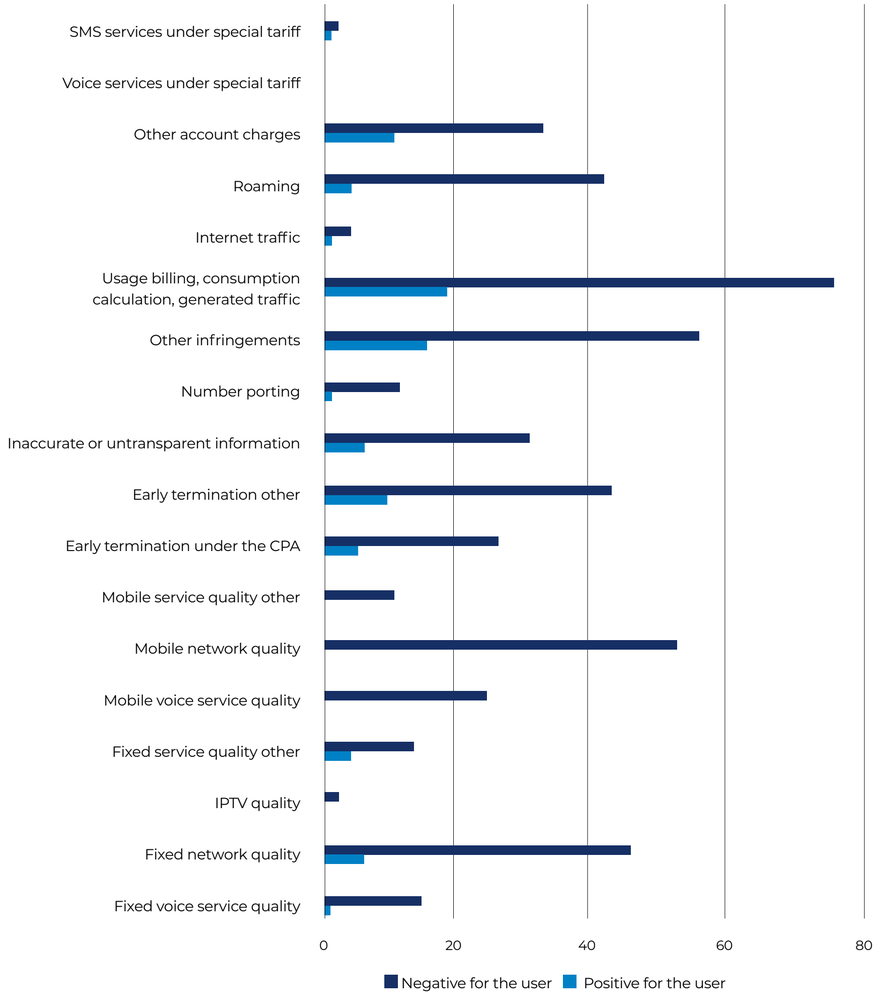


Figure 46. Ratio of decisions by reason for dispute in 2025

6.2 POSTAL SERVICES

In 2025, activities in the area of protection of users in the postal services market were primarily directed at resolving disputes between users and providers of postal services, as well as proceedings related to established market irregularities. During the year, HAKOM received 528 submissions by users, which was a considerable rise from 2024 and points to increased operating pressures in the end phase of the provision of postal services. A share of the submissions was forwarded to postal inspectors to tackle established problems through supervision inspections, while considerable attention was awarded to informing and educating users of postal services on their rights and protection opportunities.

Disputes

During the year, HAKOM resolved a total of 243 disputes, 210 of which were received in 2025. and 30 were transferred from 2024. Decisions were adopted rejecting 134 and granting or partially granting 56 further requests. In 33 disputes a decision on termination was reached (at users' requests because they resolved the disputes amicably with postal service providers), while 21 dispute ended with a decision on dismissal. The largest number of dispute resolution requests, 203, or 84 percent, was related to disputes with the universal service provider HP, while the remaining 16 percent were related to disputes with other providers of postal services.

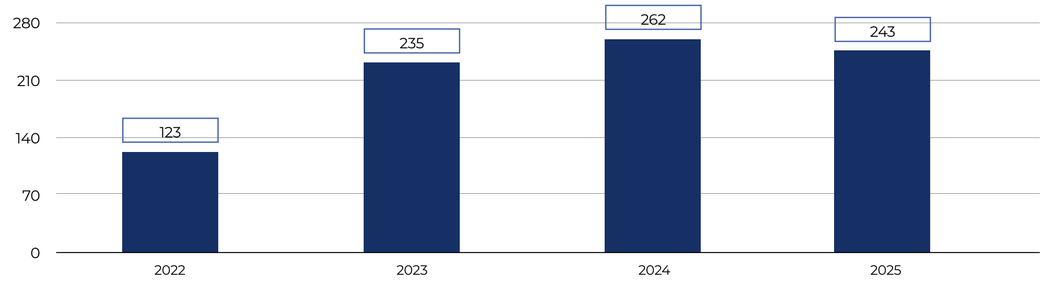


Figure 47. Number of user disputes in the postal services market

By type of complaint, users complained the most about failure to perform postal services or failure to perform postal services to the full extent, followed by the content being damaged/lost and or deadlines for delivery being exceeded.

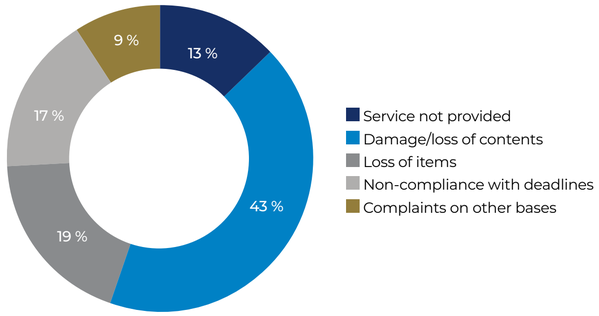


Figure 48. Shares of types of complaints in received requests in the postal services market

The largest number of dispute resolution requests was related to the performance of universal service, with the most requests being related to services connected with regular parcels (98 requests or 40 percent) and registered mail (77 requests or 32 percent). Users complained the most about services in domestic postal traffic, which accounted for 72 percent of all dispute resolution requests.

6.3 RAIL SERVICES

Pursuant to the Act on the Regulation of the Railway Services Market (ARRSM), HAKOM is competent for the protection of passenger rights in the second instance following the completion of complaint procedures with the railway undertaking or station manager. HAKOM's activities are related to resolving written complaints of passengers dissatisfied with replies of the railway undertaking or manager in the first instance. In addition to resolving complaints, a part of realised activities was related to informing and educating passengers and cooperating with market stakeholders.

Passenger complaints

In 2024, 24 passenger complaints were received and resolved by HAKOM adopting relevant decisions. Out of the total number of complaints received some were dismissed or rejected, while in some cases the requests were granted in full or in part. In one case the procedure was terminated. The most frequent reasons for passenger complaints referred to the realisation of rights under Regulation (EU) 2021/782 and the general terms and conditions of the transportation, including ticket refunds, failure to adhere to timetables, quality standards and information provided to passengers prior to and during travel.

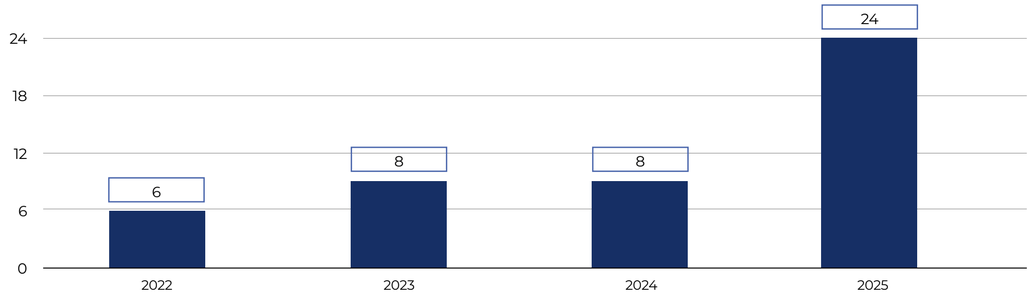


Figure 49. Number of decisions by passenger complaints

National Enforcement Bodies designated under Regulation (EU) 2021/782 – the first biannual report published at the end of June and represents one more step towards the strengthening of passenger confidence and ensuring insight into the EU-wide implementation of their rights. There are three key initiatives: a targeted revision of the Regulation, the Single Digital Booking and Ticketing Regulation and the Multimodal Digital Mobility Services Regulation. It was highlighted that AI solutions will enable national authorities to monitor compliance with passenger rights in a faster, more efficient and standardised manner.

6.4 ACCESSIBILITY

Activities directed at improving the accessibility of services under HAKOM's competence and at raising social awareness regarding accessibility were continued. Numerous interconnected activities directed at fostering dialogue with interested stakeholders, strengthening the mechanisms for the protection of persons with disabilities and development of accessible digital solutions were carried out in 2025.

The "Accessible Future" conference was held in June aiming to provide for the exchange of knowledge, to foster cooperation and raise awareness, gathering representatives of regulatory bodies, academia, civil society organisations and other relevant stakeholders. The conference served as the platform for discussion on the challenges and possibilities in connection with accessibility of digital and communication services, as well as for the exchange of experiences and good practices.

In 2025, an Advisory Mechanism for the Protection of Persons with Disabilities was established for the electronic communications market, as one of the three established during the year, aiming at a more systematic inclusion of all interested experts and representatives of persons with

disabilities in HAKOM's operations. Thus far, it has brought together the representatives of the Office of the Ombudsperson for Children, Ombudsman for Persons with Disabilities, Ministry of Labour, Pension System, Family and Social Policy, National CERT, Safer Internet Centre, as well as the representatives of the academic community from the Faculty of Law and Faculty of Electrical Engineering and Computing. The representatives of operators and 13 associations awarding special attention to persons with disabilities, protection of children or education of elderly persons also joined its work. The first meeting of the mechanism was held in November, where topics of significance for the accessibility of electronic communications and information were discussed, as well as modalities of future cooperation.

In the area of digital solutions development, HAKOM continued with the implementation of the Accessibility Programme, which is carried out in cooperation with the Faculty of Electrical Engineering and Computing. In 2025, the Programme focused on the development of the AI Assistant for questions related to users' rights in electronic communications. The prototype was developed with embedded accessibility functionalities in accordance with the guidelines defined in cooperations with representatives of persons with disabilities, aiming to ensure the widest possible accessibility of information to all end users. The experiences obtained as part of the Project may be of use to other state entities as well[9].

In continuing their efforts to raise the level of accessibility of train travel, which was the focus of the project under the Accessibility Programme in 2024, HŽPP and HŽI continued installing communication boards for persons with communication difficulties in their trains and in train stations. During the year HŽPP held workshops educating its staff on accessibility in accordance with recommendations under the project.

6.5 REALISATION OF PLANNED ACTIVITIES

Informing and educating users

Again in 2025, HAKOM continued its practice of informing and educating end users through different communication channels. Updated information on services, rights and obligations of users and operators, as well as providers and rail undertakings were made available on HAKOM's website. Users were provided with the opportunity to submit queries through direct telephone contact with HAKOM's experts, e-mail, the "Ask Us" application and on social media and via regular mail. Users could also ask questions over the phone every working day from 9 a.m. to 11.30 a.m. and from 12.30 to 3.30 p.m., while replies to queries submitted via e-mail, the "Ask Us" application and social media were provided within five working days, on average.

In 2025 users were provided with a new digital information leaflet and a printed brochure with key information and advice every user should know before using electronic communication services. A video on roaming services in EU/EEA countries was prepared to make roaming services easier to navigate.



Figure 50. Leaflet (brochure) for users of electronic communications and a brochure for children

In addition, users were informed through direct contacts with beneficiaries and the representatives of consumer associations, appearances of HAKOM's experts on TV and radio shows concerning consumer protection topics

The first meeting of the newly established Advisory Mechanism for the Protection of Older Persons in a Digital Environment was held in November. Along with HAKOM's representatives, its members include representatives of the Faculty of Law of the University of Zagreb (FPZG), of the largest operators, four consumer associations and associations of persons with disabilities.

Protection of children

To protect children, a new brochure was published with advice about dangers and safety online, protection of their privacy and personal data, behaviour on and the responsible use of social

9 Final report of the Accessibility 2025 Project: "Generalised conclusions can also serve as a basis for designing and planning projects for designing similar virtual AI assistants in other state-owned companies, which provides for a realistic insight into the amount of work, scope and consequently planning of costs, resources and other aspects of projects. Generalised conclusions can also serve as a document for defining and contracting software requirements for the functionalities of a virtual AI assistant that such a project needs to deliver in order for the result to be good for, accessible and useful to all users."

media. The brochure was distributed to all fifth-grade students in the Republic of Croatia as part of HAKOM's programme of informing children and parents, which has been implemented since 2016 in cooperation with the Ministry of Science, Education and Youth.

Students of 25 classes of primary and secondary schools were provided with educative workshops, while on the occasion of the marking of the Safer Internet Day, on 11 February 2025, a conference "Quest for a Beter Internet" was held in cooperation with the Partners in Learning association, CARNET and the National CERT. The message of the conference was the need to raise awareness on responsible use of the internet, privacy prevention and prevention of digital violence.

The first meeting of the members of the Advisory Mechanism for the Protection of Children in a Digital Environment was held in November. They include the representatives of the Office of the Ombudsperson for Children, Safer Internet Centre, FPZG, FER, the National CERT-a, of the three largest operators, two consumer associations and HAKOM.

User applications

Throughout the year users were provided with applications developed for user protection: HAKOMetar, HAKOMetar plus, Cost Estimator, and the Do Not Call Register. In addition, to warn users against and make them aware of internet fraud, especially when it comes to disclosure of personal information, HAKOM continued to update its Privacy Calculator.

Cooperation with stakeholders

HAKOM continued its cooperation with stakeholders and other authorities competent for consumer protection. It regularly participated in the work of the National Council for Consumer Protection and cooperated with interested parties. The annual meeting with representatives of consumer protection associations was held in September relating to rights of users and obligations of services providers in the areas of electronic communications, postal and rail services. In addition, nine lectures were held in cooperation with consumer protection associations regarding user rights and operators' obligations (on Krk, in Šibenik, Nuštar, Zadar, Daruvar, etc.). HAKOM also organised a conference in 2025 entitled "The Postal Market of Tomorrow: Users – Technology – New Rules" dedicated to the effects of consumer needs and expectations on the development of innovation, the quality of postal services and future regulatory direction. The opportunity was used to hold a regular round table with representatives of consumer protection associations and exchange information on current developments in the postal services markets and on issues of protection of user rights.

HAKOM's activities in the protection of users and passengers in 2025

No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Financial Plan	Realised outcome	Implementation assessment and recommendations
1.	1.1, 5.3	Implement the 2025 Accessibility Project	2025 Accessibility Project	IV/IV	N, 3239	Project completed in 2025	Achieved
2.	1.1, 4.3	Organise a conference with the topic on persons with disabilities	2025 Accessible Future Conference	II/II	N, 3233, 3235, 3237	Accessible Future Conference held	Achieved
3.	1.1, 4.2	Resolve user disputes with electronic communications operators	Administrative acts	Ongoing	N	833 user disputes resolved	Achieved
4.	1.1	Analyse the work of operator consumer complaints commissions	Semi-annual and annual report	I i III/I i III	N	Analysis published, Semi-annual and annual report published	Achieved
5.	1.1	Cooperate with the representatives of operator consumer complaints commissions	Recommendations for improvements in the processing of consumer complaints	Ongoing	N	10 meetings held	Achieved
6.	1.1,4.2	Analyse operators' general terms and conditions, special conditions and price lists	Recommendations for amendments due to deficiencies	Ongoing	N	8 general terms and 257 price lists analysed Necessary amendments requested from operators	Achieved
7.	1.1	Monitor and measure the quality of provided electronic communication services, simple and transparent selection of service providers	Applications in operation: HAKOMetar HAKOMetarplus Cost Estimator	Ongoing	N, 3238	Availability of all applications >99% of the time	Achieved
8.	1.1	Maintain Do Not Call Register and cooperate with the ME, traders and users	Register operational, accessible to users and traders	Ongoing	N, 3238, 454	Availability of the register >99% of the time	Achieved

9.	1.1	Inform and educate electronic communications users	Workshops and lectures, media appearances, social media posts	Ongoing	N, 3233	15 workshops held in cooperation with associations, 9 thematic posts published on social media, 10 thematic appearances/ statements for the media, updates of contents on the rights of electronic communications users on HAKOM's website; digital leaflet delivered, brochure printed, video for users of roaming services in EEA created and published, brochure on the protection of children published and a printed copy distributed to all fifth-grade students; Advisory Mechanisms for children and older persons established, , answered 2,507 end-user inquiries (via app, social media, post and email), handled 6,481 end-user calls, and managed 13 media inquiries.	Achieved
			Cooperation with associations				
			Brochure, leaflet and video				
			Responses to user queries given in the shortest possible period				
10.	1.1	Increase accessibility for persons with disabilities	Accessibility of services and products to persons with disabilities	Ongoing	N	Advisory Mechanism for the Protection of Persons with Disabilities	Achieved
11.	1.1	Educate and raise awareness of the protection of children in electronic communications	Safer Internet Day marked in February	Ongoing	N, 3233, 3235	Safer Internet Day marked by conference "Search for a Better Internet" Webinar prepared for parents and guardians, Privacy Calculator updated	Achieved
			Workshops for children and young people			25 workshops held across primary schools	
12.	1.1	Resolve user complaints with postal services providers	HAKOM's decisions	Ongoing	N	243 user disputes resolved	Achieved
13.	1.1	Cooperate with the representatives of user complaints commissions at the providers	Recommendations for improvements in the processing of consumer complaints	Ongoing	N	3 meetings held with representatives of providers and their commissions 2 decisions adopted by inspectors regarding the removal of irregularities in resolving user disputes	Achieved
14.	1.1	Inform and educate postal services users	Workshops and lectures, media appearances, social media posts	Ongoing	N	3 appearances on TV shows aired on national televisions in relation to consumer protection	Achieved
						6 workshops held	
			Cooperation with associations			Several dozens of telephone queries answered	
			Responses to user inquires given in the shortest possible period				

15.	1.1,1.2, 4.2, 4.3	Passenger dispute resolution	Decisions HAKOM's	Ongoing	N	24 disputes resolved	Achieved
16.	1.2	Monitor general terms and conditions of transport contracts	Legal and fair transport contract conditions for all passengers	Ongoing	N	Amendments to general terms and conditions of transport contracts -Tariff 101 for transport of passengers in domestic transport	Achieved
17.	1.1, 5.3	Implement the recommendations under the 2024 Accessibility Project	Workshops	I-IV/I-IV	N	Workshops held at HŽPP; Communication boards installed at train stations and on trains	Achieved
18.	1.1, 1.2	Conduct consultations with users of passenger rail transport	Consultation analysis prepared and published	I/I	N	Consultations analysis prepared	Achieved
19.	1.1	Inform and educate passengers	Media appearances, social media posts	Ongoing	N, 3233	10 thematic posts published on social media Cooperation with autism associations ASK and HEKUP and with FER and ERF Informative materials have been postponed due to planned amendments in the complaint procedure and rights and obligations of passengers; prolonged to 2026 Response provided to 60 user queries	Achieved

7

RF SPECTRUM MANAGEMENT



7.1 OVERVIEW OF RF SPECTRUM MANAGEMENT

The management of the radiofrequency spectrum (RF) represents one of HAKOM's key horizontal regulatory functions, which ensures efficient, effective and uninterrupted use of radio frequency resources. RF spectrum is a limited natural resource of key importance for the function of electronic communications networks and services, broadcasting, the operation of special services of particular importance, security systems, transport and other economic and social activities. RF spectrum is managed in accordance with national regulations and international obligations assumed by the HR, especially within the framework of EU membership and the membership in the International Telecommunications Union (ITU). Aiming to ensure the principles of regulatory predictability and for the purpose of responsible, transparent, efficient and effective management of the RF spectrum public consultations were carried out at the end of 2025, while a Strategic Plan for Radiofrequency Spectrum Management for 2026–2029 was adopted early in 2026.

Basic Indicators

Basic indicators related to the RF spectrum management in the HR in 2025 are shown in Figure 51. They include data on radiocommunications infrastructure, including the mobile communications networks, broadcasting systems, microwave and satellite systems, as well as the radiofrequency spectrum control system.

Mobile communications – base stations	2G	3G	4G	5G	5G 3.6 GHz
	6,293 +229	4,020 -768	24,343 +4,505	5,151 +1,467	684 +473
Broadcasting – terrestrial transmitters	FM radio	DAB + transmitters	TV transmitters		
	606 -6	40 0	303 +3		
Microwave and satellite systems	Active microwave links	Average capacity	Active Croatian satellites		
	5,203 +2.7%	634 Mbit/s +9.1%	1 0		
Spectrum control – SYSTEM	Control measuring centre	Measuring vehicles	Remotely controlled unmanned stations		
	4	5	14		
Measurements and interferences	Fixed stations	Field measurements	Domestic interferences	International complaints	
	5,461	800	107	789 (FM. Italy)	

Figure 51. Basic indicators of RF spectrum management

7.2 RADIOCOMUNICATIONS NETWORKS

7.2.1 Mobile communications networks

Public networks

Following the allocation of the radiofrequency spectrum for public mobile communications networks to three mobile operators in the 800 MHz, 900 MHz, 1800 MHz, 2100 MHz and 2600 MHz frequency bands at the national level in 2023, the conditions for licences continued to be met in 2025.

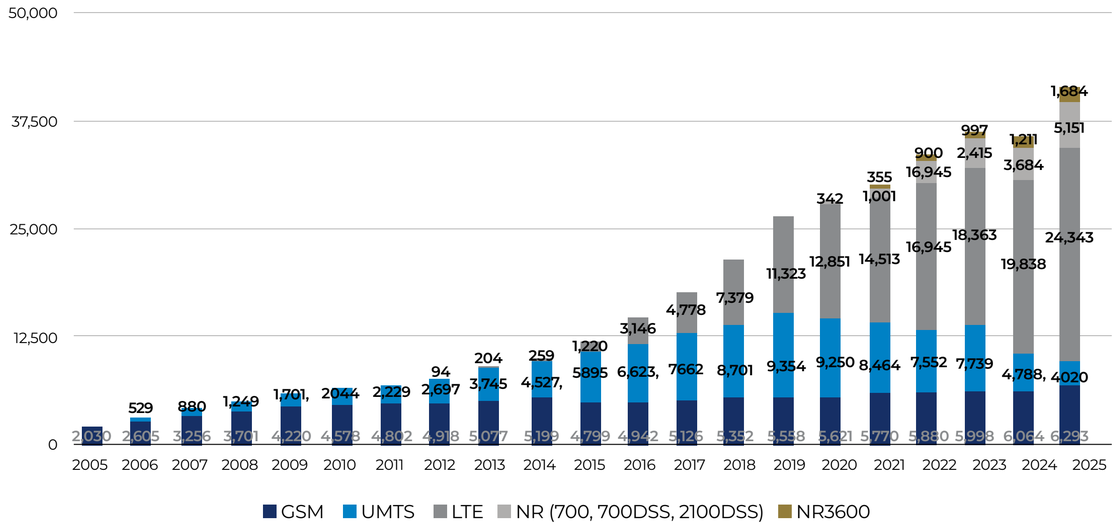


Figure 52. Number of base stations by technology in the last 20 years

The number of 2G and 3G base stations reflects the initiated decommissioning of the 3G technology, while the increase in the number of 4G and 5G base stations is connected with the increase in the quality and coverage, and the mentioned decommissioning of 3G. The reason behind the rise in 2G base stations is the compatibility of the existing telemetric equipment with this standard, which will remain in use for some time to come as the technology which ensures great coverage for voice calls and an efficient manner of transfer of smaller quantities of data for older IoT devices.

Private mobile communications networks

The existing analogue private networks have continued transitioning to digital technology, and all new networks are being implemented exclusively in the digital mode. Broadband networks for own use, that is, networks with the local use of the RF spectrum in limited geographical areas have not fully come to life yet. Although initial interest is there, network realisation itself is still very slow.

7.2.2 Microwave and satellite networks

Microwave links have an important role in ensuring transfer capacitates of electronic communications networks, especially as part of the access and transport infrastructure of the mobile communications networks. There were altogether 5,203 microwave links in the HR at the end of 2025, their number increasing from the previous year.

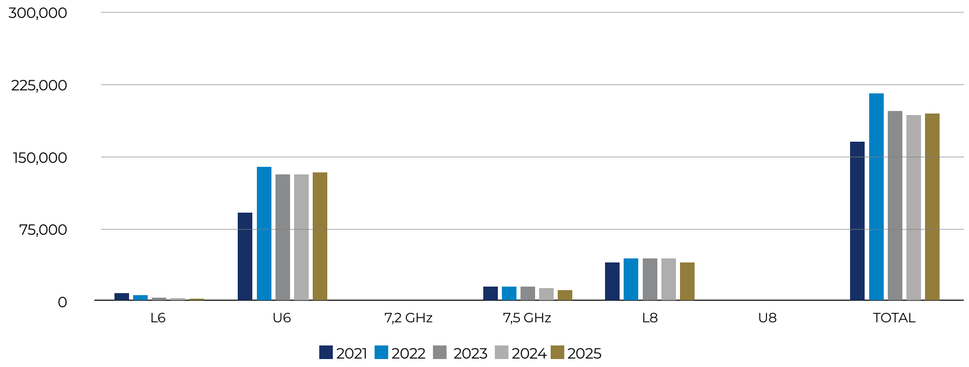


Figure 53. Transmission capacity of microwave links under 10 GHz, by year

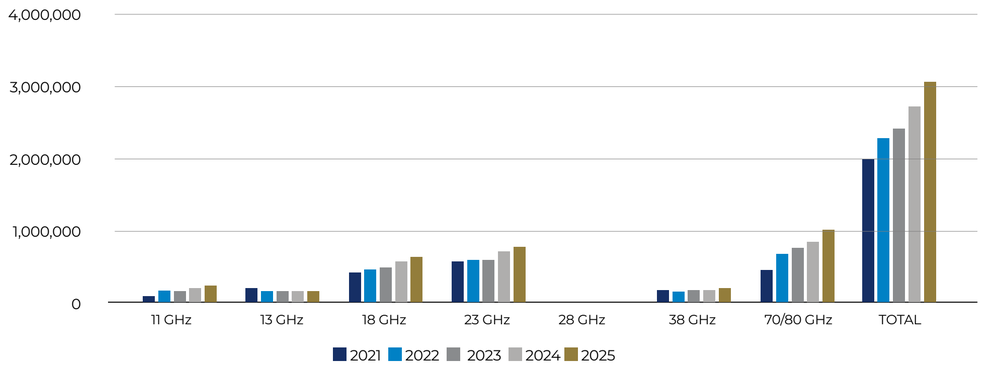


Figure 54. Transmission capacity of microwave links above 10 GHz, by year

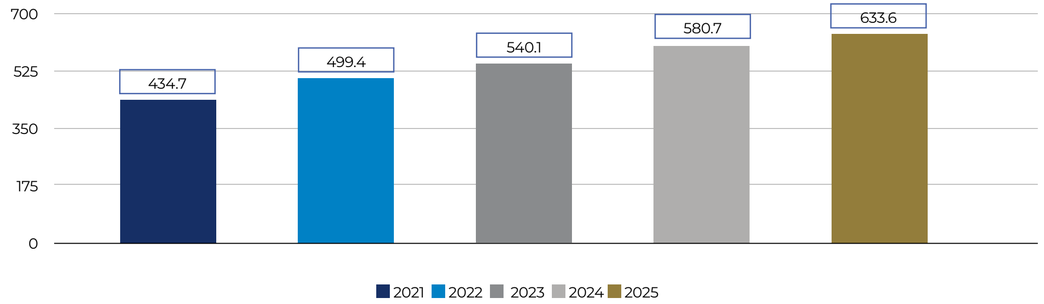


Figure 55. Average transfer speed of digital microwave links (Mbit/s)

It is noteworthy that the total transfer capacity of microwave links is on an upward path, increasing 12.2 percent from 2024. This is attributable to further upgrades to mobile communications networks and the need for ensuring an increasingly higher transfer capacity to end users. This trend is expected to continue in the coming years, especially in the context of further implementation of 5G networks.

An analysis of transfer capacity by frequency band indicates an increase in the 11 GHz, 18 GHz, 23 GHz, 38 GHz and 70/80 GHz frequency band, as well as a mild growth in the upper 6 GHz (U6) frequency band. A stagnation of transfer capacity was noticed in the 7,2 GHz, lower and upper 8 GHz (L8 and U8) frequency bands and the 28 GHz frequency band, while the lower 6 GHz (L6), 7,5 GHz and 13 GHz frequency bands registered a decrease. The overall transfer capacity in frequency bands below 10 GHz points to a stagnation, which was expected considering the limited availability of the frequency resources in these bands. The frequency band above 10 GHz registered continued growth in capacity.

Although the number of microwave links in the 13 GHz frequency band continues to exceed that in the 11 GHz, the difference is narrowing as the years go by, with the realisation of links in the 11 GHz band more frequently becoming the first choice. The average transfer capacity of digital microwave links in 2025 was 634 Mbit/s, which is an increase of 9.1 from the previous year.

As regards **satellite communications**, in accordance with ITU's Radio Regulation, in 2025 HAKOM confirmed that the first Croatian Satellite CroCube became operational. The satellite was successfully launched into the LEO orbit at an altitude of 510 km at the end of 2024, formally completing the procedure of registration of the use of radio frequency of the satellite network to the International Telecommunications Union.

7.2.3. Radio and television networks

Radio and television networks are an important part of radiocommunications and play an important role in providing information to the public and in media pluralism. There were altogether 606 FM radio transmitters in the HRK at the end of 2025, 40 DAB+ transmitters and 303 TV transmitters, with these networks not significantly changing: 3 transmitters were added to the digital TV multiplex, the number of DAB+ transmitters remained the same, while the number of transmitters for analogue FM radio decreased by six.

Analogue radio (FM)

The analogue radio in the FM (87.5–108 MHz) frequency band continued to have an important role in terrestrial broadcasting. At the end of 2025, there were altogether 153 networks of analogue radio operating in Croatia, of which 11 public networks of the Croatian Radio (three state-wide and eight regional) and 142 commercial networks. Programmes were transmitted via a total of 606 FM transmitters.

Digital radio (DAB+)

The DAB+ digital radio platform in the HR transmits within the VHF III (174–230 MHz) frequency band via 40 DAB+ transmitters. In 2025, no new broadcasters entered the existing multiplex M1. Despite this, digital radio will remain an important segment in the development of the terrestrial radio. This technology provides for further network expansion and realisation of additional multiplexes at local, regional and national level, depending on the expression of interest.

Digital terrestrial television (DTV)

Digital terrestrial television is transmitted in the UHF (470–694 MHz) frequency band. There were no significant changes in 2025 relating to the realisation of new transmitters or additions in the coverage of existing networks. There are four terrestrial digital television networks with national coverage and two networks with coverage at the local level in operation, with a total of 303 DVB-T2 transmitters. As of November 2025, all television networks transmit DVB-T2, H.265/HEVC encoded signal in HD quality. National networks for multiplexes M1 and M2 and local networks for multiplexes L1 and L-ZA are free-to-air networks, while two national networks for multiplexes MUX C and MUX E transmit the Pay-TV programmes of the EVO TV Pay-TV platform.

7.3 SPECTRUM CONTROL

The control and supervision of the radiofrequency spectrum were conducted via a network of control-measuring centres in the four largest cities, via remotely operated measuring stations scattered across the HR and via five specially equipped measuring vehicles. Measuring vehicles are used for field measurements and together with immovable control and measuring stations provide for an ongoing supervision of the operation of the radio system, for monitoring compliance with licences and removal of interferences.

A total of **5,461 measurements were carried out from immovable control and measuring stations in 2025 and some 800 field measurements**. All measuring campaigns envisaged under the annual plan were successfully completed, including the protection from interferences, measuring the level of electromagnetic fields (EMFs), verifying the coverage of mobile telecommunications networks and checking compliance of WAS/RLAN devices in the 5 GHz frequency area as well as checks of the operation of radio stations in microwave and broadcasting systems. In addition, measurements were carried out that were necessary for the international coordination of frequencies, as well as activities within the framework of the RSPG.

7.4 REALISATION OF PLANNED ACTIVITIES

Planning and allocation of the radiofrequency spectrum

Regular activities of planning and allocation of the radiofrequency spectrum were carried out in 2025, including the issuing of new licences at request, issuing approvals for services of particular importance and adopting decisions on revocation of licences when legal requirements were fulfilled. Most procedures were carried out via the electronic system of e-Licence, with more than 96 percent of applications being received and processed electronically, thus continuing the process of digitalisation of administrative procedures.

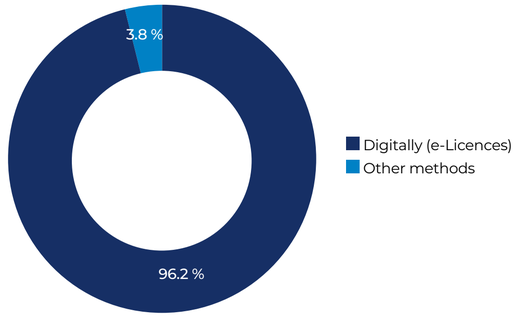


Figure 56. Manner of receiving applications and issuing licences in 2025

A total of 5,512 licences for the use of the radiofrequency spectrum were granted in 2025, 163 decisions on revocation of licences and 20 approvals were issued to services of particular importance, as well as one certificate for fiscalisation purposes. A total of 22,642 invoices were issued for fees collected for the use of the radiofrequency spectrum.

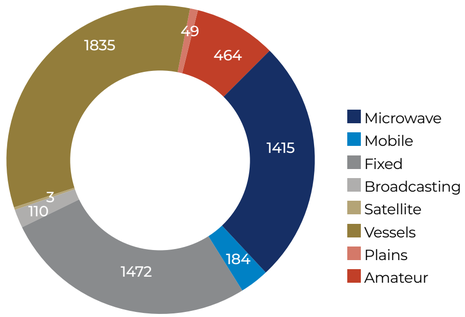


Figure 57. Number of RF licences issued at request by type of licence

Public mobile communications networks and 5G

As part of the supervision of compliance with the conditions for licences of the use of the radiofrequency spectrum allocated in 2023, individual postponements regarding compliance were granted in 2025, while inspection supervision procedures were initiated for a portion of the obligations in special interest areas. In addition, certificates of compliance were issued for base stations, with 2025 ending with a total of 15,740 issued certificates. This is to be attributed to changes in frequencies and base stations complying with the conditions for spectrum use.

The 5G working group continued its work in 2025, focusing primarily on the monitoring of the implementation of 5G networks and meeting the terms of the licences in the context of the goals under the National Plan for Broadband Development 2021–2027. At the meetings of the working group, challenges in the implementation of 5G networks were discussed, including infrastructural and administrative issues and property relations.

Private networks and cooperation with public authorities

Activities on international harmonisation of private mobile communications networks were undertaken in 2025, including continued cooperation with the administrations of countries that the HR has signed coordination agreements with. In addition, negotiations were reactivated regarding the cross-border coordination in the 410–430 MHz and 450–470 MHz frequency bands.

Intensive cooperation was continued with the Ministry of Defence, which was reflected in the greater scope of approvals issued for the purposes of the Ministry and NATO forces. Cooperation was also continued with the Ministry of the Interior, the Croatian Civil Aviation Agency and Croatia Control regarding the use of the radiofrequency spectrum for unmanned aerial vehicles and related counter-systems.

Microwave and satellite networks – licences and international coordination

In the area of microwave links, HAKOM carried out activities of international coordination pursuant to the HCM Agreement for fixed service, including the sending of the register of coordinated microwave lists to countries in the coordination zone and processing of received applications. At the same time, HAKOM processed applications for licences for new microwave links, amendments to technical parameters and extension of licences.

In the area of satellite communications, HAKOM processed requests for licenses and applications for the installation of radio stations in the satellite service, as well as coordination requests for terrestrial stations and satellite networks in compliance with ITU procedures.

Radio and television networks – technical procedures and international harmonisation

A series of technical analyses relating to the launching of new radio stations and improvements in the coverage of existing analogue and digital broadcasting networks were conducted in 2025. The Agency for Electronic Media was submitted technical parameters and information necessary to open the public tender for radio concessions. In the area of digital radio and television, procedures for international harmonisation were continued in accordance with GE84 and GE06, including participation in multilateral and bilateral meetings and processing of requests for harmonisation of technical parameters of radio and television networks. HAKOM also made a public call for issuance of the new licence for the local television multiplex L-ZA, the validity of which was harmonised with other licences for terrestrial digital television.

Interferences in radio communications

Within the framework of systemic supervision of the radio spectrum in 2025, HAKOM processed 107 reports of domestic interferences, most of them associated with maritime communications. All interferences were removed following inspections in the field.

A comprehensive campaign of measuring radio and TV signals in coastal areas was carried out in the summer months for the purpose of monitoring the situation in frequency areas from international GE84 and GE06 plans. Measurements confirmed the presence of interferences caused

by FM radio stations from the Italian Republic affecting more than a hundred of Croatian FM frequencies along the coast and on islands. There were 789 international reports sent in 2025 in accordance with ITU rules.

Five thematic meetings were held within the framework of international cooperation, and a total of 13 international interferences were removed.

Special measuring campaigns and development of the measurement system

As part of the implementation of the supervisory campaign of WAS/RLAN devices in the area of 5 GHz, HAKOM recorded a significant increase in use from the previous year, while the number of devices outside the scope of valid general licences remained at approximately the same level. Determined irregularities were notified to 25 identified owners for a total of 241 devices, after which most users harmonised their operations with prescribed conditions.

HAKOM commissioned and completed an independent survey of the quality of mobile networks services, including measuring key performance indicators and user experience parameters. The results were presented to operators and publicly disclosed for the purpose of transparency and motivating improvements in provided services. The control and measuring system was additionally improved through the procurement of new measuring equipment and calibration of all existing instruments, thus ensuring the required precision of all measurements and technical inspections.

Control of electromagnetic fields

In 2025, in addition to regular reports of authorised legal persons, HAKOM conducted 65 EMF measurements in areas of increased sensitivity. All measurement reports are available via the GIS portal of radio stations and EMF measurements, enabling users to review the measurement locations and results, and technical characteristics of stations.

The determined increased levels of electromagnetic fields gave rise to 11 inspection supervisions throughout of the year, which resulted in HAKOM ordering decreases in the exit strengths of radio stations which caused these increased levels.

HAKOM's activities in the area of RF spectrum management in 2025

No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Financial Plan	Realised outcome	Implementation assessment and recommendations
1.	2.3	Verify the meeting of conditions from licences for public mobile communications networks	RF spectrum use in accordance with licences	IV/IV	N	Conducted verification of meeting conditions from licences Inspection proceedings initiated	Achieved
2.	4.2	Head and organise the 5G working group	Working group meetings and documents prepared	Ongoing	N	Working group meeting held, progress report on the introduction of 5G networks within the 2025 NPBD submitted	Achieved
3.	1.1	Organise an event (conference) to promote new technologies	HAKOM's "Day of New Technologies" conference	II/II	N, 3233, 3235, 3237	Conference "Day of New Technologies" held	Achieved
4.	2.3	Harmonise RF spectrum internationally	Implementing agreements on spectrum use with neighbouring countries and radio stations harmonised	Ongoing	N	Technical agreement on cross-border coordination of MFCN networks in the 700MHz band signed	Achieved
5.	3.2	Amend the Ordinance on RF spectrum use and adopt RF spectrum allocation plans	Ordinance on RF spectrum use and allocation plans ready for adoption in accordance with international regulations, interest shown and market and technology development	III/III	N	Proposal of amendments to the Ordinance on RF spectrum use and allocation tables submitted to the MSTI	Achieved

6.	4.2	Issue compliance certificates	Certificates for radio stations that comply with conditions	Ongoing	N	15,740 certificates issued	Achieved
7.	2.3	Issue licences for the RF spectrum use pursuant to submitted applications	HAKOM's administrative acts	Ongoing	N	5,512 licences and authorisations issued	Achieved
8.	2.3	Prepare calculations and issue annual invoices for the RF spectrum use for valid licences	Annual invoices for the RF spectrum use	Ongoing	N	22,642 invoices issued	Achieved
9.	2.3	Plan and optimise radiocommunication networks	- Efficient use of the RF spectrum - Improved coverage of existing networks - Conditions for operation of new networks ensured	Ongoing	N	152 parameters for planning and optimising existing radio-communication networks set	Achieved
10.	2.3	Control the radiofrequency spectrum regularly	Measurement reports on conducted measurements	Ongoing	N	5,461 measurements conducted	Achieved
11.	4.2	Resolve international interferences	International meetings International interferences requiring additional communication removed	Ongoing	N	5 thematic meetings held 13 international interferences removed	Achieved
12.	2.3	Resolve domestic interferences	Domestic interferences removed	Ongoing	N	107 reports of interferences, all interferences removed	Achieved
13.	4.2	Conduct a measuring action of interferences from Italian Republic	Measurement report Reports on the removal of interferences	III-IV/III-IV	N	Internal measurement report prepared 789 interferences reported in accordance with ITU's procedure	Achieved
14.	4.2	Control the levels of electromagnetic fields (EMF)	GIS browser of radio stations and EMF measurements Measurement reports	Ongoing	N	Availability of an updated, interactive browser of radio stations and EMF measurements >99 % of the time Some 65 measurements conducted and measurement reports published	Achieved
15.	2.3	Implement a Measuring operation WAS/RLAN in the 5 GHz frequency area	Detailed measurement reports	Ongoing	N	Internal measurement report prepared	Achieved
16.	2.3	Implement the operation of measuring key performance indicators of mobile telecommunications networks	Detailed measurement reports	Ongoing	N	Measurement report prepared	Achieved
17.	2.3	Maintain control and measuring system	New measuring equipment Calibrated measuring equipment	Ongoing	N, 3232, 422	Agreements signed All instruments calibrated	Achieved

8

BROADBAND COMPETENCE OFFICE (BCO)

HAKOM has the role of the Broadband Competence Office (BCO) pursuant to the ECA and a role of the national BCO. The main BCO's task is to foster broadband access development in the HR by cooperating with stakeholders, promoting investments in infrastructure and using available co-financing, monitoring the realisation of co-financed projects and the realisation of expressed commercial interest, as well as encouraging demand for VHCNs. The BCO also cooperates with other competent authorities in the implementation of strategies, plans and programmes for broadband access development. HAKOM is a member of an EU-wide Broadband Competence Offices Network (BCO's Network) and participates in the Network's activities through expert workshops and exchange of experiences with other BCOs.

8.1 NATIONAL FRAMEWORK PROGRAMME

As the Competent Authority for the NFP (CAFP) for the development of the broadband infrastructure access in areas lacking sufficient commercial interest for investments, HAKOM monitors the implementation of cofinanced projects based on Broadband Infrastructure Development Plans (BIDPs).

BIDP projects are cofinanced in two rounds of fund allocation, first from the funds provided for within the framework of the European Regional Development Fund (ERDF), the Operational Programme Competitiveness and Cohesion 2014–2020 (OPCC 2014–2020), while the second round comes from the Recovery and Resilience Fund (RRF), within the framework of the National Recovery and Resilience Plan 2021–2026 (NRRP).

For the use of funds allocated in the first round, known also as the NFP1, 20 BIDP projects were completed, ensuring the broadband internet access at speeds higher than 40 Mbit/s to 143,278 households, 194,325 addresses and 232,044 users. Considering that the largest portion of the constructed network is the FTTH network, the realisation of these projects has enabled access speeds higher than 100 Mbit/s at most covered addresses.

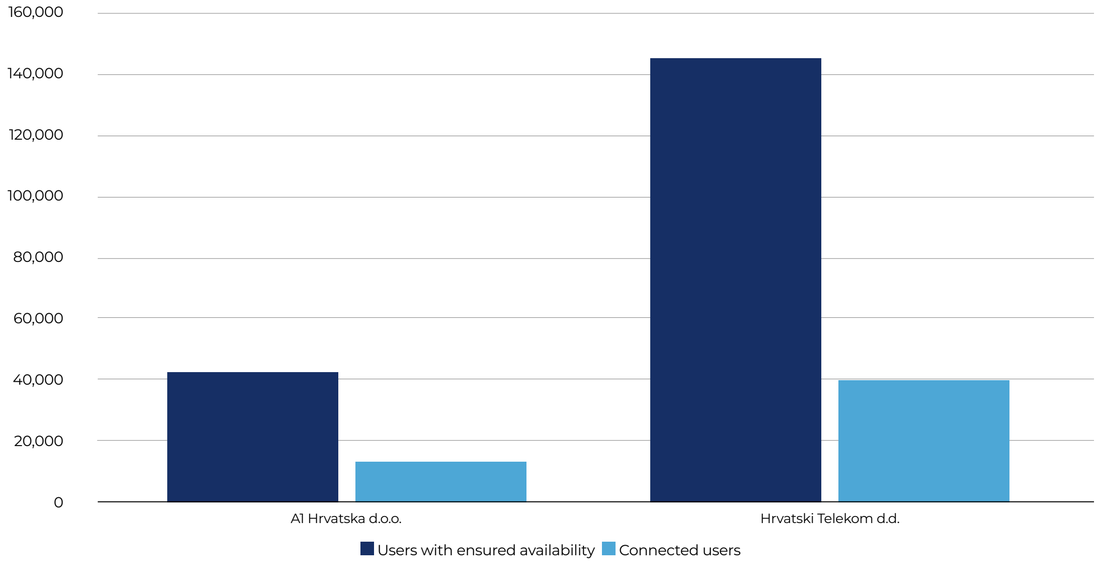


Figure 58. Connected users Q4/2025 – BIDP model A

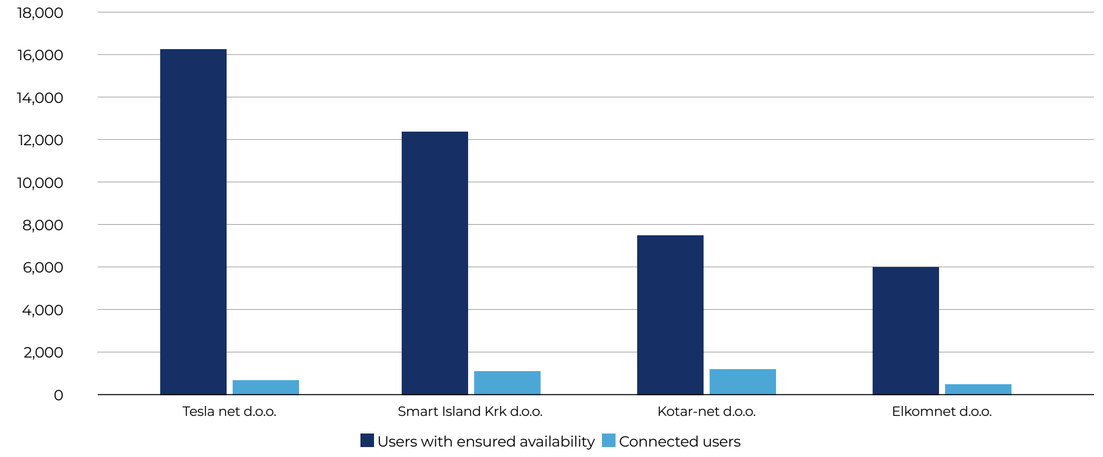


Figure 59. Connected users Q4/2025 – BIDP model B

As the CAFP, HAKOM is obligated to continue monitoring the use of the developed network for seven years following completion. Thus, in 2025 it gathered information on the number of connected users in the area covered by each project. In the first year, there were approximately 24 percent of the total number of users connected. The percentage of active connections in relation to the covered user units (take-up) is close to 28 percent.

8.2 NATIONAL RECOVERY AND RESILIENCE PLAN

By the end of the second quarter of 2025, 30 agreements on the cofinancing of BIDP projects were signed due to funds ensured within the framework of the NRRP. Although the implementation of all projects started on 2 July 2025, the Central Finance and Contracting Agency for European Union programmes and projects (CFCA), as an implementing authority terminated all agreements with the user Optix Infrastructure d.o.o. Despite numerous meetings and attempts to find an adequate solution, agreements were finally terminated because of considerable delays in the meeting of contracted obligations.

Following the termination of contracts with Optix, 13 projects remained, of which 10 are being implemented under model A (private DBO model; DBO – design, build, operate), and three under model B (public DBO model). These projects include 85,487 addresses and 59,381 households, with the building of the infrastructure for their coverage being cofinanced with EUR 43,547,375.48. At the end of 2025, all projects that are being implemented under model A reached the stage of network deployment, while all projects implemented under model B were in the network projecting phase. Of the addresses included, 4,106 were realised by the end of 2025. The project implementation phases are regularly updated and disclosed on the NFP web page.

8.3 CONNECTING EUROPE FACILITY – CEF DIGITAL

Following the publication of the fourth CEF call at the end of October 2024, at the beginning of 2025 six projects were submitted, with Croatian companies as principals or partners. Projects could apply for one of the three areas: the European Quantum Communication Infrastructure (EuroQCI initiative), Backbone connectivity for Digital Global Gateways and 5G large scale pilots. Out of 6 projects submitted, 1 was in the area of the European Quantum Communication Infrastructure, and the remaining 5 were 5G large scale pilots.

HAKOM is one of Croatia's contact points for CEF Digital and, at the same time, pursuant to the Cybersecurity Act, the authority competent for cybersecurity for electronic communications operators. HAKOM, as the competent authority for cybersecurity, validates the security guarantees for operators applying for CEF Digital co-financing, if required by the conditions of the call, or if such a guarantee is subsequently requested during the project evaluation. In 2025, HAKOM certified security guarantees for operators involved in three of the six registered projects.

The EC decision on selected projects proposed for signing of the cofinancing agreements was published in November 2025, and among the 56 projects selected there are two with Croatian partners. The first is "Introducing 5G for Next Generation Airports", coordinated by Hrvatski Telekom d.d., and Markoja d.o.o., the Faculty of Transport and Traffic Sciences of the University of Zagreb and Airports Zagreb, Zadar and Pula as partners. The second is "Deployment and Operations of Quantum Ground Nodes" coordinated by the German Areospace Centrum (Deutsche Zentrum für Luft- und Raumfahrt – DLR), and Friedrich-Alexander University (Friedrich-Alexander-Universität Erlangen-Nürnberg), DLR Space Applications Institute mbH (DLR Gesellschaft für Raumfahrtanwendungen mbH), Institute Ruđer Bošković, Faculty of Electrical Engineering and Computing and Faculty of Transport and Traffic Sciences of the University of Zagreb, and Croatian Academic and Research Network as partners. The cofinancing agreements were signed at the end of 2025, and projects will be implemented from the beginning of 2026 to mid-2029.

8.4 REALISATION OF PLANNED ACTIVITIES

Cooperation and provision of information

In June 2025, HAKOM hosted the annual meeting of the BCO network. The two-day workshop, organised in cooperation with the BCO Network Support Facility of the European Commission included thematic lectures and panel discussions on the future of broadband connectivity in Europe, including financing models after 2027, investments in submarine cables and next generation secure network development which includes the application of quantum technologies. The second part of the workshop featured a visit to the location were the optical fibre network cofinanced from non-repayable EU funds was laid.

In 2025, HAKOM continued cooperating with stakeholders and providing information on topics related to broadband access through several communication channels. The BCO's web page was regularly updated, disclosing relevant information. HAKOM held workshops attended by representatives of the units of local and regional self-government and operators in connection with the use of networks built through cofinancing. The cooperation with ministries and other public authorities took the form of meetings, conferences and presentations. HAKOM is a member of the Working group for the National Roadmap – Path to the Digital Decade policy programme and of the Commission for monitoring and implementation of the National Plan for Broadband Development in the HR in the period 2021–2027, and thus in 2025 participated in the work of these authorities and preparation of regular annual reports on the implementation of their plans and programmes.

In addition to participating in the work of the BCO network, the BCO realised its international cooperation in meetings of expert working groups of the European Commission and BEREC relating to mapping the quality of services in 5G networks, the 5G Smart Communities – 5GSC initiative and activities related to the copper network decommissioning.

Activities of the Broadband Competence Office in 2025

No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Fina-ncial Plan	Realised outcome	Implemen-tation assessment and recomme-ndations
1.	3.2	Cooperate with ministries, agencies and business entities regarding NRRP implementation (MSTI, CFCA, operators)	Activities related to NRRP implementation carried out	Ongoing	N	Updated data in HAKOM's databases and on CAFP's website	Achieved
2.	4.2	Participate in the work of the Operational Programme Competitiveness and Cohesion (OPCC) Monitoring Committee	Monitoring progress in the achievement of specific OPCC objectives Committee meetings	Ongoing	N, 3233	No meetings of the OPCC Monitoring Committee held in 2025	
3.	3.3	Monitoring the implementation of the C2.3 R4-I1 measure from the NRRP	Prepare reports on NRRP implementation	Quarterly	N	4 internal reports prepared	Achieved
4.	3.3	Monitor the implementation of operators' commercial interests	Report on the implementation of operators' commercial interests	Quarterly	N	Internal report prepared	Achieved
5.	5.1	Report to the European Commission on the implementation of measure C2.3 R4-I1 from the NRRP	Report on the implementation of the FNP and NRRP	IV / I 2026	N	Report prepared	Achieved
6.	3.2, 4.1	Organise and hold an international workshop of the BCO Network in Croatia	Present projects and examples of good practices Workshop held	II	N, 3235	Croatian State Aid Scheme presented, CEF projects, presentation on quantum communications held Workshop held	Achieved
7.	3.1, 3.2	Carry out activities of the Broadband Competence Office (BCO)	Content of the BCO website regularly updated and relevant Coordination of bodies included in BCO activities	Ongoing	N	11 new posts published on BCO's website Successful coordination and cooperation with the MSTI and MJPADT	Achieved
8.	3.3	Consult and inform the public and interested stakeholders with regard to broadband development	Consultation conducted and information provided Workshops held	Ongoing	N	Presentations held at thematic conferences, appearances in the media, responses provided to 62 user queries 4 workshops held with operators and representatives of local and regional self-government	Achieved

9.	3.3	Cooperate with stakeholders with regard to broadband development	Cooperation realised Work in expert groups Meetings	Ongoing	N	Successful cooperation with companies and institutions: HT, A1, Elkomnet, Kotar-net, Tesla net, Ericsson, OiV, IRB, Carnet, SRCE, GDi Participation in the Commission for monitoring of the national policy programme Path to the Digital Decade 8 meetings with operators held	Achieved
10.	3.3, 5.2	Cooperate with international bodies and participate in meetings of the European BCO Network and in the work of other international groups	Cooperation realised and the level of expertise raised Meetings	Ongoing	N	2 workshops of the FTTH Council held 2 workshops of 5G Smart Communities – 5GSC initiative held BEREC meeting on the 19 meetings of the BCO Network held	Achieved

9

DIGITAL SERVICES ACT (DSA)



The Digital Services Act (DSA) establishes a single regulatory framework for digital services in the EU market, aiming to ensure a safer, more transparent and responsible digital environment by preventing the dissemination of illegal content and protecting users (from the risks arising from the use of online platforms), while strengthening trust in the EU Digital Single Market.

The Digital Services Coordinator acts as the national authority in charge of supervising the implementation of the legal provisions in its Member State. In the HR this role is assumed by HAKOM, which coordinates work with other competent authorities, services providers and users. At the EU level, coordinators cooperate with the European Commission, coordinators from other Member States and the European Board for Digital Services (EBDS), contributing to harmonised application of legislation in the territory of the European Union.

The DSA specifically addresses the obligations of providers of intermediary services, such as appointing contact points for users, providing justifications for restrictions on the provision of services and providing access to complaint-handling systems. In its role HAKOM does not assess the content or merits of the decisions taken by providers of intermediary services but focuses on their compliance with the provisions of the DSA. Its implementation contributes to the strengthening of confidence in digital services through education, transparency requirements and faster response to problems, thus supporting the development of a single market for digital services in the European Union.

In 2025 HAKOM fully operationalised the role of the Digital Services Coordinator – through the establishment of a Digital Services Sector and the entry into operation of key tools (such as the e-Provider DSA system), strengthening cooperation with national and European authorities and implementing activities aimed at a safer and more transparent digital environment. A more detailed description can be found in the section on the Realisation of planned activities.

9.1 REALISATION OF PLANNED ACTIVITIES

Educating and providing information to users

A number of activities were carried out in 2025, contributing to ongoing provision of information to users about their rights and services under the Digital Services Act. Relevant information and news related to the implementation of the DSA were published regularly. Activities related to the protection of children and to raising of the level of security in the digital environment were in special focus and were carried out continuously in cooperation with relevant institutions and organisations. The aim was to raise awareness about the safe use of the internet and strengthen the capacities of parents and children, which is an important part of the broader regulatory framework for digital security. The DSA was presented on the Safer Internet Day as an individual topic.

Within the framework of activities related to informing and educating the public, HAKOM also participated in the panel of the Croatian Chamber of Economy, the round table “Combating Piracy in the Digital Age”, in the panel of the international conference under the ADMO project and in the round table entitled “DSA Civil Society Coordination Group and CDT Europe”. In addition, HAKOM held a lecture within the framework of a civil society workshop held by GONG, a civil society organisation, on disinformation and attacks on civic discourse on social media, as well as a lecture organised by the National School for Public Administration on the topic of artificial intelligence and DSA. Working meetings were held with a large Croatian platform.

e-Provider DSA

The e-Provider DSA system was established for registering intermediary service providers and submitting notifications on the provision of intermediary services. Training was provided for users and providers, expert support ensured to obliged entities, and conclusions of meetings of European bodies taken into consideration. User queries were processed in a timely manner with focus on compliance of the procedures with the provisions of the Act.

Coordination and cooperation

In its function of the DSA Coordinator for the HR, HAKOM held bilateral meetings with competent authorities under Article 6 of the Act on the Implementation of Regulation (EU) 2022/2065 with the competent authorities of the HR, in addition to HAKOM as the coordinator, included in the work of EBDS relevant working groups. Numerous meetings were held with the Ministry of Justice, Public Administration and Digital Transformation (MJPADT) and the Representation of the European Commission in Croatia. HAKOM also became a member of the Coordination Board for the Enforcement of Intellectual Property Rights (KOPPPIV).

HAKOM carried out activities aimed at preserving the integrity of the digital environment during electoral processes. In cooperation with competent authorities and online platforms, communication protocols and procedures in cases of reported illegal or harmful content were harmonised and mechanisms provided for timely reaction in accordance with the regulations. The use of the EU AGORA system has become regular. In addition, in 2025 HAKOM held bilateral meetings with very large online platforms (VLOPs) Met and Tik-Tok.

Subordinate legislation

At the end of the year, HAKOM prepared the Draft Ordinance laying down criteria and procedures for the granting, suspension or revocation of the trusted flagger status. As preparation, meetings were held with entities that have expressed interests in acquiring the trusted flagger status. HAKOM also participated in the work of the EBDS WG3 working group, drafting Guideli-

nes for trusted flaggers. Since the drafting of guidelines by the EBDS WG3 was late, HAKOM put up the proposal of the ordinance for public discussion in March 2026 and adopted it in May 2026.

Annual report on DSA

In its role of the national coordinator for digital services, HAKOM prepared an Annual Activity Report in accordance with Article 55 of the Digital Services Act, which contains detailed unified data and includes activities of other competent authorities. The report is publicly available on HAKOM's website and was submitted to the European Commission and the European Board for Digital Services

HAKOM'S activities as digital services coordinator							
No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Fina-ncial Plan	Realised outcome	Impleme-ntation assessment and recomme-ndations
1.	4.1	Participate in the adoption of the act on the DSA implementation	Comments and opinion on the proposal of the Act	I/II	N	Submitted opinion and fiscal impact assessment form; Act adopted	Achieved
2.	4.1	Participate in the work of the European Digital Services Committee	Meetings of the European Digital Services Committee held	I-IV/I-IV	N	Participation in nine EBDS meetings (6 regular and 3 ad-hoc); Participation in 89 working group meetings of WG1-WG8 EBDS	Achieved
3.	4.1	Coordinate and cooperate with competent bodies at national level	Cooperation of national competent bodies established	I-IV/I-IV	N	Bilateral meetings with competent authorities under Article 6 of the Act on the Implementation of Regulation (EU)2022/2065 held; Competent authorities included in the work of EBDS relevant working groups; HAKOM became a member of the Coordination Board for the Enforcement of Intellectual Property Rights (CBEIPR); Numerous meetings held with MPUDT, the Representation of the European Commission in Croatia and other relevant institutions and authorities.	Achieved
4.	4.1	Establish the record of obligors of DSA application	Criteria for providers of intermediary services established in the HR defined	II/III	N, 454	e-Provider DSA system established	Achieved
5.	4.1	Use IT system for exchange of information with the European Commission	Use of joint EC IT system established at all competent bodies	II/II	N	The use of the EU AGORA system in place (roles assigned and functionalities used in accordance with assigned roles)	Achieved

6.	4.1	Draft subordinate legislation under the Act on the Implementation of the DSA	Subordinate legislation adopted	III-IV	N	Meetings held with entities that have expressed interests in acquiring the trusted flagger status Active participation in WG3 EBDS entrusted to draw guidelines for trusted flaggers, Draft Ordinance prepared	Proceeding as planned
7.	4.1	Coordinate and cooperate with other Digital Services Coordinators	Functional cooperation with other Digital Services Coordinators at EU level established	I-IV	N	Bilateral meetings held with coordinators of other Member States (IE, SI, CZ, EL) Complaints under Article 53 of the DSA forwarded Relevant data regularly exchanged via the AGORA system	Achieved
8.	4.1	Educate and inform service providers and users	Seminars Workshops	Ongoing	N	Regular notifications of news relevant for the DSA Multiple presentations, seminars and workshops held Participation in panels on DSA topics Working meetings held with a large Croatian platform Bilateral meetings held with VLOPs (Meta and Tik-Tok)	Achieved

10

HAKOM'S OTHER ACTIVITIES



10.1 BEREC

HAKOM, after the chairmanship of BEREC in 2024, was the Outgoing Chair during 2025 and was responsible for international activities. Of these, the organisation of the BEREC MiniBoard study visit to the United Kingdom and the organisation of the four-lateral summit of the BEREC-Ea-PeReg-EMERG-REGULATEL regulators network in Barcelona are particularly noteworthy. As the body of EU regulators, BEREC carried out an ambitious work programme in 2025, based on the EU regulatory framework. Particular emphasis was placed on contributing to the development of the EU legislative framework, including the Digital Networks Act (DNA) initiative, as well as on the implementation of the Digital Markets Act (DMA), with BEREC publishing the opinion on the interoperability of services, such as Messenger and WhatsApp. Additionally, guidelines were issued within the GIA, a methodology for mapping the quality of broadband services was developed, and progress in switching off of copper networks was monitored. Also, an opinion was issued on operators' obligations regarding the security of networks and services and consumer protection in the event of security incidents. HAKOM's experts regularly participated in the work of BEREC's working groups and in the preparation of relevant documents, including in the role of drafters.

10.2 COOPERATION

As part of achieving its strategic objectives, HAKOM continuously develops and strengthens international cooperation, with a particular emphasis on active participation in the work of the European regulators' networks: BEREC, IRG-Rail and ERGP, as well as in the work of the EBDS on DSA matters. These regulators networks serve as a mechanism for the coordination of regulatory activities at the EU level and play an important role in ensuring the single market, legal predictability and a stable regulatory framework. By participating in their work, HAKOM is not only abreast of European trends and regulatory initiatives in a timely manner, but also actively contributes to shaping EU policies. As the national regulator, HAKOM is also involved in numerous international events and actively participates in the work of the relevant bodies, organisations and working groups related to electronic communications, radiofrequency spectrum, postal services and rail. A comprehensive overview of international cooperation during 2025 is presented in the table below.

The past year was marked by the final year of the chairmanship of BEREC in the role of Outgoing Chair, but also by contributions to the work of other bodies and networks of regulators, such as IRG-Rail and the ERGP. HAKOM's representatives thus participated in the work of numerous working groups, in the preparation of opinions and reports, and in the exchange of good practices.

Within the cooperation at the European Regulators Group for Postal Services (ERGP), the work was organised in several working groups that addressed issues related to universal service, regulatory accounting, the prices of postal services, market developments and indicators, quality and consumer protection, consumer satisfaction and the cross-border traffic of postal items. HAKOM's representatives participated in the preparation of ERGP documents, including individual reports, and in providing expert opinions to the European Commission on the development of the regulatory framework for postal services. This included the initiative to amend the Postal Directive, an analysis of medium-term trends and the application of new technologies in the industry. During the year, the ERGP's activities were considered at plenary meetings held in July 2025 in Istanbul and in November 2025 in Tromsø (Norway).

Cooperation within IRG-Rail was carried out through participation in the work of working groups and the preparation of thematic documents. The documents covered the application of direct costs in Europe, market segmentation and margins, charges for traction current, the regulatory approach to private sidings, multimodality and mobility as a service, and the implementation of the existing regulatory framework. The activities also included the exchange of experiences on the functioning of rail freight corridors and the preparation of the 14th annual market monitoring report. At the plenary meetings, documents were adopted relating to monitoring the performance indicators for rail freight corridors, data on service facilities and the development of the European Register of Infrastructure (RINF), storage sidings from a market structure perspective, access conditions and charges, and quality indicator systems in rail transport, including the related annex.

HAKOM's representatives regularly participated in the work of certain relevant committees of the European Commission, such as the Connecting Europe Facility Coordination Committee (CEF), the Radio Spectrum Committee (RSC), the Communications Committee (COCOM), the Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM), the European Board for Digital Services and the Postal Directive Committee.
Cooperation in the implementation of the DSA is primarily reflected in the work of the EU Digital Services Committee, which assists the EC with the implementation of the act at the EU level and the challenges that arise. Within this Committee, eight expert working groups have been established to address various aspects of the DSA. HAKOM's experts were involved in the work of each group.

Among the EC's expert working groups, noteworthy is the work of the Radio Spectrum Policy Group (RSPG) – a high-level advisory group assisting the EC in the development of RF spectrum policy. In 2025, through the RSPG sub-group, HAKOM continued to actively participate in the

work of the Good Offices Sub-Group for cross-border cooperation, which is seeking a solution for several-years long Italian radio interferences.

Following a request submitted by HAKOM in November 2022 for good offices and the issuance of an RSPG opinion for the coordinated solution of cross-border harmful Italian FM interferences, the EC initiated the procedure for the breach of EU law in November 2025. The procedure was initiated for failure to comply with the European Electronic Communications Code (Directive (EU) 2018/1972) and the Framework Directive (Directive 2002/21/EC).

The EC sent an official notification (INFR(2025)2153) to the Italian Republic and set a two-month deadline for a response. Depending on Italy's further cooperation, the EC may suspend the procedure if it is satisfied with the Italian proposal for the resolution of interferences. It can also request that the proposal be supplemented and improved, or proceed to the next stage of the procedure, namely the issuance of a reasoned opinion. Ultimately, the case may be referred to the Court of Justice of the European Union.

Table 4. International cooperation – organisations/institutions

	Organisation/ institution	Data on organisation/institution	Number of meetings in 2025
EC committees	Connecting Europe Facility (CEF) Coordination Committee	The committee that assists the EC in establishing measures of the Connecting Europe Facility (CEF).	2
	Radio Spectrum Committee (RSC)	The committee that assists the EC in preparing technical implementation measures that have the objective to harmonise conditions with regard to the availability and efficient use of the RF spectrum as well as the availability of information connected with the RF spectrum usage.	3
	Communications Committee (COCOM)	The committee that assists the EC in adopting implementing acts concerning the regulatory framework for electronic communications.	2
	Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM)	The committee that assists the EC in implementing the obligations under the RED Directive (Directive on the making available on the market of radio equipment).	2
	European Board for Digital Services	The board that contributes to the consistent application of the Digital Services Act and efficient cooperation between Digital Services Coordinators. It is responsible for the coordination of EC guidelines and analyses, Digital Services Coordinators and other competent authorities on new issues in the internal market with regard to the issues covered by the Digital Services Act and contributes to those guidelines and analyses. It also assists Digital Services Coordinators and the EC in supervising VLOPs and VLOSEs. Working groups: WG1 – Horizontal and legal issues WG2 – Working together WG3 – Content moderation and data access WG4 – Integrity of the information space WG5 – Consumers and online marketplaces WG6 – Protection of minors WG7 – Orders and criminal issues WG8 – IT Issues	Board meetings: 9; Working groups meetings 89
	Postal Directive Committee	The committee that assists the EC in applying the legislation on common rules for the development of the internal market in postal services and enhancement of service quality.	2
EC expert groups	Radio Spectrum Policy Group (RSPG)	Develops opinions which are meant to assist and advise the EC on radio spectrum policy issues, on coordination of policy approaches and, where appropriate, on harmonised conditions with regard to the availability and efficient use of the radio spectrum necessary for the establishment and functioning of the internal market. The European Parliament and the Council can also request advice from the RSPG. Working groups: Peer review and MS cooperation 6G Strategic Vision Good offices cross-border cooperation Spectrum strategic issues Strategy on the future use of the frequency band 470-694 MHz Strategic vision of 6 GHz band World Radiocommunication Conference	35

	Commission Expert Group on Emergency Communications (EG112) ari	Assists the EC in the preparation of delegated acts with regard to caller location information solutions, access for end-users with disabilities and routing to the most appropriate Public Safety Answering Point (PSAP).	1
	Submarine Cable Infrastructure Expert Group	Assists the EC in the implementation and preparation of legislative proposals in relation to the safety of submarine cables.	5
	High Level Group on Internet Governance (HLIG)	Assists the EC in coordination at the EU level in internet governance related issues.	1
	Expert Group on the transition to Web 4.0 and Virtual worlds	Assists the EC with a view to developing and promoting common, consistent European approaches on the development of virtual worlds and the wider technological transition to Web 4.0 to avoid a potential fragmentation of the Single Market, notably by ensuring coordination among Member States and existing relevant EU forums.	1
	European Union Agency for Cybersecurity (ENISA)	The EU agency dedicated to achieving a high common level of cybersecurity across Europe. HAKOM participates in the work of the Advisory Group.	2
	European Competent Authorities for Secure Electronic Communications (ECASEC)	The expert working group of the EU, EEA and EFTA national authorities, as well as the national authorities of candidate countries. The objective is the discussion and agreement on a harmonised approach to telecommunication security and supervision of the EU telecommunications sector.	23
	Network and Information Systems (NIS) Cooperation Group 5G/Telekom sub-group	NIS Cooperation Group has the objective to ensure a high common level of security for network and information systems in the EU. Competent sectoral bodies are RH representatives and the Office of the National Security Council is the single point of contact.	3
	Administrative Cooperation Group - Radio Equipment Directive (AdCo RED)	EU cooperation in the field of market surveillance in the segment that relates to radio equipment and batteries. Working groups Radio Equipment Directive (AdCo RED) Batteries (AdCo Batteries)	5
	Single European Railway Area Forum (SERAF)	Assists the EC in the preparation of delegated and other legislative acts and in the implementation of regulations concerning the single rail market.	6
	National Enforcement Bodies for Rail Transport - NEB Forum	The forum under the auspices of the EC, where experiences are exchanged with the aim to establish best practices for the protection of the rights of passengers in rail transport, its harmonisation and proposing changes to the legislative framework.	1
	European Network of Rail Regulatory Bodies (ENRRB)	The EC advisory body, which discusses issues and practices in the area of regulation of the rail services market of importance for the work of regulatory authorities.	2
European	European Conference of Postal and Telecommunications Administrations (CEPT) Committee for ITU Matters (Comm-ITU)	A committee within the CEPT responsible for ITU matters. HAKOM participates in the work of the Committee.	3
	European Conference of Postal and Telecommunications Administrations (CEPT) European Communications Committee (ECC)	The body within the CEPT, responsible for technical and regulatory electronic communications issues and RF spectrum management. It consists of working groups that develop recommendations and decisions related to the frequency spectrum, numbering resources and other aspects of electronic communications. Working groups: WGSE (Spectrum Engineering) WGSE PT SE19 (Fixed Services) WGFM (Spectrum Management) WGFM PT22 (Control and Monitoring) Civ/Mil (Civil/Military) CPG (Conference Preparatory Group) PT FM44 (Satellite Communications) SRD/MG (Short Range Devices) EFIS/MG (ECO Frequency Information System Maintenance Group) ECC PT1 (Mobile Networks) WG NaN (Numbers and Networks) NaN1 (Future of Numbering Issues) NaN2 (Number Portability, Regulatory Issues) NaN3 (Emergency Services) FM 61 – WAS/RLANs and ITS SE21 – Unwanted Emissions FM 61 – WAS/RLANs and ITS SE45 – AS/RLAN in the 5925 – 7125 MHz Band PT22 FM22 SE45	36
	European Conference of Postal and Telecommunications Administrations (CEPT) European Committee for Postal Regulation (CERP)	A body of the CEPT dealing with information exchange and coordination of postal policies among European countries. It focuses on regulatory, technical and economic issues in the postal sector.	1

EU regulators' networks	Body of European Regulators for Electronic Communications (BEREC); BEREC Board of Regulators (Odbor regulatora); BEREC Management Board (Upravni odbor)	An independent body that gathers European national electronic communications regulatory authorities with the aim of harmonising the regulation of electronic communications, promoting competition and protection of end users. It assists the European Commission and national regulatory authorities in the implementation of the EU regulatory framework for electronic communications. At request and at its own initiative, it provides advice to European institutions and, at the European level, supplements regulatory tasks performed by national regulatory authorities at the national level. It adopts decisions at the plenary meetings of the Board of Regulators and the Management Board. Working groups: Fixed Network Evolution Market Analysis Wireless Network Evolution Regulatory Framework Digital Markets Remedies and Market Monitoring Sustainability Planning and Future Trends Roaming Cybersecurity End Users Open Internet ICT Communications	4 Board meetings and 4 Contact Network meetings; 328 working group meetings
	European Regulators Group for Postal Services (ERGP)	An advisory body to the EC that gathers national regulatory authorities for postal services from EU Member States. Its purpose is the promotion of harmonised and efficient regulation of the postal sector in the internal market. Decisions are adopted at plenary meetings. Working groups: Access and Interoperability Consumers and Market Indicators Cross Border Parcel Delivery Regulatory Framework Sustainability	2 plenary meetings and 2 Contact Network meetings, 14 working group meetings
	Independent Regulators' Group (IRG Rail)	A network of independent regulatory authorities for the rail sector in Europe, promoting a single, competitive and sustainable internal railways market. Decisions are adopted at plenary meetings. Working groups: Access Emerging Legislative Proposals Market Surveillance Charges Access to Service Facilities Charges for Service Facilities	2 plenary meetings and 2 Contact Network meetings 42 working group meetings

International organisations	Internet Corporation for Assigned Names and Numbers (ICAAN)	A non-profit organisation that manages the global system of internet domains and IP addresses.	3
	Governmental Advisory Committee (GAC)	An advisory body within the ICANN that enables governments to give recommendations on public policy issues related to online resources management.	3
	International Telecommunication Union (ITU)	A specialised agency of the United Nations that coordinates the global issues of telecommunications and information technologies. HAKOM participates in conferences (plenary meetings and WRC), and in its everyday work it mostly participates in the work of the ITU-R (Radiocommunication Sector).	0
	Radiocommunication Sector ITU-R	Within the ITU, it manages the radiofrequency spectrum and the development of technical standards for radiocommunication systems throughout the world.	1 ITU BR meeting (Italian FM
	Organisation for Economic Co-operation and Development (OECD)	An international organisation that promotes economic growth, financial stability and fosters trade cooperation among developed countries. It addresses digital policy through committees and working groups that develop guidelines for the digital economy, privacy and cybersecurity. –NER	1
	Universal Postal Union (UPU)	It is a specialised agency of the United Nations that coordinates postal policies and rules among member countries at a global level.	0

	HCM (International Agreement on Coordination)	A group that oversees and manages the application of the international agreement for the coordination of radio frequencies in the mobile and fixed services. Working groups: HCM Plenary HCM MS – Mobile Service HCM FS – Fixed Service	4
	European Mediterranean Regulators Group (EMERG)	A network of regulatory authorities for electronic communications from Europe and the Mediterranean (Albania, Algeria, Bosnia and Herzegovina, Egypt, Israel, Jordan, Kosovo, Lebanon, Libya, Montenegro, Morocco, North Macedonia, Palestine, Serbia, Tunisia, Türkiye), established for the purpose of strengthening cooperation, exchanging knowledge and harmonising regulatory practice. The organisation serves as a platform for discussion on common challenges in the electronic communications sector.	2 plenary meetings
	Eastern Partnership Electronic Communications Regulators Network (EaPeReg)	A network of regulatory authorities for electronic communications from the Eastern Partnership countries (Armenia, Azerbaijan, Belarus (suspended for political reasons), Georgia, Moldova, Ukraine) and the European Union, established for the purpose of strengthening cooperation, harmonising regulations and fostering market development. The objective of the network is to support reform processes in the area of electronic communications through the exchange of experiences and good practices. Working groups: IRB EWG – Independence of Regulators and Broadband Development Working Group REWG – Roaming Expert Working Group SEWG – Spectrum Experts Working Group	1 plenary meeting
	RIPE NCC	Réseaux IP Européens (RIPE) is a forum open to all those interested in broadband IP networks. RIPE aims to ensure the administrative and technical coordination necessary to enable internet operation. HAKOM participates in round tables for the representatives of regulators and the public sector.	3
	IGF (Internet Governance Forum)	The UN convened Internet Governance Forum serves for an equal gathering of stakeholders from different stakeholder groups in discussions on public policy issues related to the internet.	1
	The Independent Regulators Group (IRG)	The network of national regulatory authorities for electronic communications in Europe, which serves for the exchange of experiences and the harmonisation of regulatory approaches. Its objective is to promote effective competition and develop a single European telecommunications market.	4 CN meetings and 4 general meetings

10.3. RIA

In 2025, all planned regulatory impact assessments were carried out. The assessments carried out related to the analysis of the M2/2020 and ex M14/2003 markets, the development of an MVNO model for assessing economic replicability, the determination of charges for delays in the provision of regulatory wholesale services in the M1 and M3b markets, and the modelling of the regulation of the universal service price (USO). At the same time, throughout the year, special attention was paid to refining and optimising HAKOM's methodology for conducting a regulatory impact assessment.

10.4 PUBLICITY OF OPERATIONS AND ACCESS TO INFORMATION

Public access to information and data complied with the regulations in effect in the HR and was restricted solely in cases of the protection of privacy and official or business secrets. Decisions, rulings and other relevant acts were regularly published on HAKOM's website, in addition to the continuous updating of information on administrative acts and court decisions.

Public consultations were conducted for decisions that could have a significant impact on the market, with a total of 18 consultations held during 2025. HAKOM regularly informed the public about important events and regulations through publications and press releases, of which there were a total of 87 during the year.

Cooperation with the media was continuous. During the year, there were 89 queries submitted by the media, of which 25 concerned appearances on programmes or providing statements, while the remaining enquiries were answered in writing.

Direct communication with citizens was carried out by telephone, e-mail and online applications. HAKOM also used social networks (Facebook, LinkedIn and YouTube) in its communication with the public. During the year, 12 requests for access to information were received and resolved, and the report on the implementation of the Act on the Right of Access to Information was submitted to the Information Officer.

10.5 INSPECTION ACTIVITIES

In 2025, HAKOM's inspection activities were carried out in accordance with the inspection's Annual Work Programme and based on reports, petitions and other information about possible breaches of regulations.

Conducted inspection supervisions have shown that the supervised entities, in a significant number of cases, comply with the prescribed obligations. In some cases, irregularities were identified which were remedied during the procedure or by the measures imposed. All inspection decisions are publicly available.

Electronic communications

Protection of end users

In the field of consumer protection, inspection supervisions were carried out with an emphasis on preventive action, including checks on the operation of points of sale, the accessibility of services for persons with disabilities, customer support services, and complaint and dispute resolution procedures. Irregularities, or breaches of regulations were identified in three of the seven inspection supervisions. The non-compliances related to remote service contracts, the failure to provide users with a summary of the contract, and the failure to resolve end users' complaints concerning the quality of internet access service in a timely manner and completely. One motion for indictment was filed, while in the remaining two cases there was no basis for a further initiation of misdemeanour proceedings.

Inspection supervisions were also carried out on the three largest operators regarding promotional services and their transparent listing in price lists, with the aim of enhancing clarity and protecting the rights of end-users.

Due to an increased number of reports of fraudulent text messages related to the services with special tariffs, an inspection supervision was carried out, during which measures were ordered to restrict the use of the disputed numbers and checks were conducted on the use of unregistered numbers. This resulted in a decision prohibiting such practices.

In 2025, the review of the price lists and general terms and conditions of smaller operators continued, during which no major irregularities were identified.

Fifteen inspection supervisions of operators of the fixed internet access service were carried out. The irregularities identified related to general terms and conditions, speed advertising, the work of customer support services, issuing invoices and users´ rights to compensation. In twelve procedures, operators eliminated the irregularities in the course of supervision, while three procedures were ongoing at the end of 2025.

General authorisation, universal service and number portability

One inspection supervision was carried out concerning compliance with the quality parameters of the universal service. Furthermore, eleven inspections were carried out concerning the untimely switching of operators and the payment of compensation to users. In eight cases, compensation was paid during the procedure; in one case, payment was ordered by a decision, while in two cases users' requests were rejected. One enforcement decision was also issued.

Two inspection supervisions were also carried out concerning the general authorisation and the provision of electronic communications services without a licence; in one case an order was issued to rectify irregularities, and in the other the operator ceased to provide the service in the course of the procedure.

Regulatory obligations of operators with significant market power

Two inspection supervisions were carried out of an operator with significant market power. In both procedures, breaches of the regulatory obligations of access, transparency and non-discrimination were found.

In the first case, the harmonisation of procedure with the applicable regulatory obligations was ordered, specifically, the implementation of the regulatory obligation of access. The information provided in the report for business users must be accurate and include the necessary conditions for broadband network access, and operator–user requests for the wholesale broadband access service via the optical fibre network for new end-users must be fulfilled in accordance with the provisions of the applicable reference offer.

In the second case, measures were ordered to ensure that operators-users are notified 30 days in advance of the construction of a new optical fibre installation to the home, or of the installation at the level of the access to the building or distribution node. Due to failure to comply with this decision, enforcement orders imposing fines were also issued.

Electronic communications infrastructure and associated facilities

In 2025, nineteen inspection supervisions were carried out on seven operators and one legal person – a contractor in the ECI zone. Three inspections identified irregularities concerning the condition of the access networks, for which decisions were issued and which the operators complied with.

Based on reports and information obtained from the media, four inspections were initiated, during which irregularities were identified and decisions were issued, which the operators implemented within the allowed time limits.

Two procedures concerning the execution of works in the area of electronic communications infrastructure and six inspection supervisions of the construction of the optical fibre distribution networks were carried out, which were complied with by operators.

Radiofrequency spectrum

In 2025, seven inspection supervisions were carried out to ensure compliance with the conditions of radio spectrum usage licences. The irregularities identified resulted in the issuance of six decisions, while the procedure in one case was suspended.
Eleven inspections were also carried out in relation to elevated electromagnetic field levels. In all cases, adjustments to the output power were ordered, and follow-up measurements confirmed compliance.

Eight inspection supervisions were carried out in the area of placing radio equipment on the market, of which seven in cooperation with the Customs Administration, during which import bans were imposed on three products. In addition, 50 document reviews were conducted, without the need to initiate an inspection supervision

Postal services

In 2025, inspectors dealt with 57 cases. Irregularities were identified in seven inspection supervisions and, in all, eight decisions were issued. The irregularities concerned the delivery of items, follow up on user objections and complaints and preparing and keeping of postal documents.

One misdemeanour procedure was initiated.

Rail services

In 2025, five inspection supervisions were carried out over the passenger undertakings and four inspection supervisions over infrastructure and service facilities operators. Irregularities were identified concerning passenger information, assistance to persons with disabilities, and the fulfilment of obligations in the event of delays and injuries sustained by passengers. Decisions were issued and follow-up checks were carried out.

The verification of compliance of 15 descriptions of service objects published in the Network Statement for 2026 was also conducted ex officio.

10.6 COURT PROCEEDINGS

Court proceedings include administrative disputes initiated against HAKOM's decisions, misdemeanour proceedings initiated by HAKOM against natural and legal persons for breaching legislative provisions within HAKOM's competence, enforcement proceedings against legal and natural persons for non-payment of fees for the use of addresses, numbers and the RF spectrum (state budget) and for the performance of HAKOM's duties, as well as proceedings where HAKOM applied for its claims against a debtor over whom pre-bankruptcy or bankruptcy proceedings have been opened.

Administrative disputes

In 2025, 1,148 decisions were issued and 32 administrative lawsuits were initiated, accounting for around one percent of the 833 disputes resolved at first instance. The majority of the lawsuits concerned disputes between users and operators.

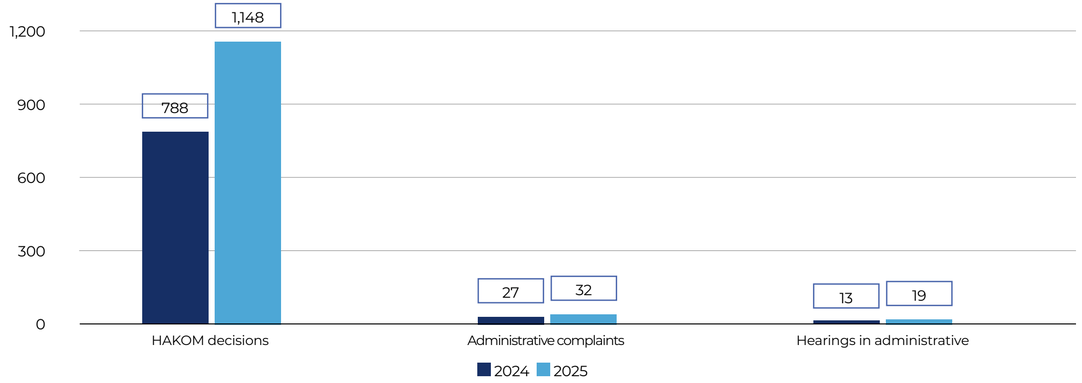


Figure 60. HAKOM decisions, administrative complaints and hearings in administrative disputes

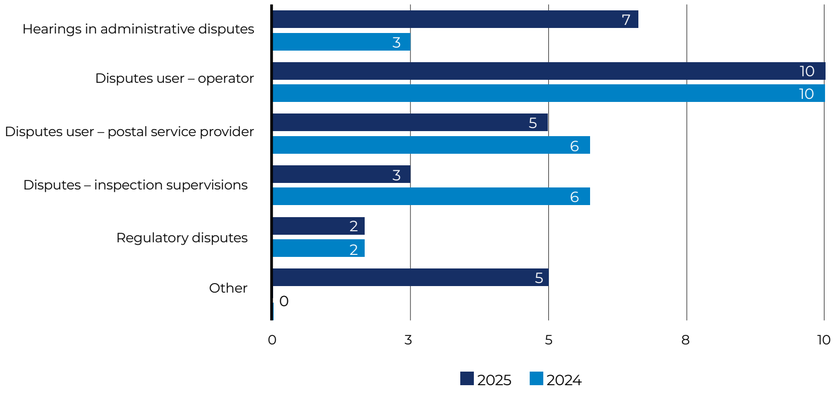


Figure 61. Administrative complaints by type of decision

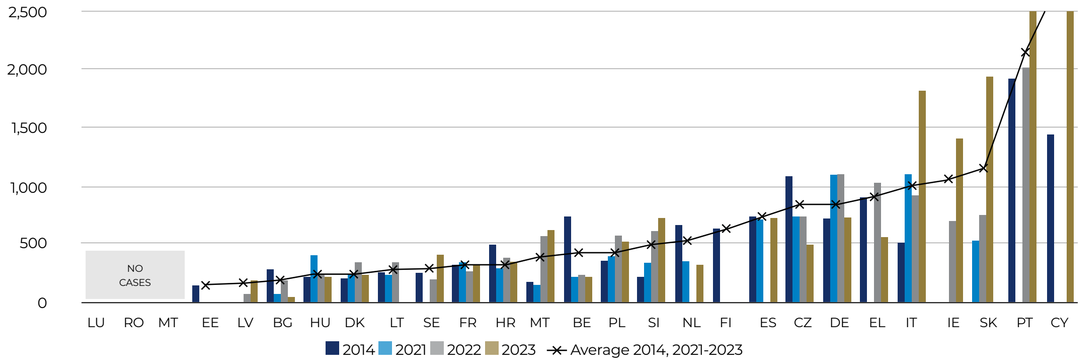


Figure 62. Electronic communications: average duration of court proceedings in 2014 and in the period from 2021 to 2023[10] (first instance/in days) (Source: European Commission and Communications Board)

According to the data of the EU Justice Scoreboard, the average duration of proceedings conducted pursuant to the ECA in Croatia was around 330 days, placing the country among better-ranked EU Member States in terms of efficiency.

Misdemeanour proceedings

In 2025, five judgements were delivered, four of which were final. Four motions for indictment were filed in the areas of electronic communications, postal and rail services. The cases mainly concerned breaches of regulatory obligations and irregularities in the provision of services.

Enforcement and bankruptcy proceedings

Enforcement proceedings were initiated in the total amount of EUR 12,546.71, and the amount of EUR 4,540.46 was collected, with an additional EUR 504.28 from proceedings initiated in previous years.

In the bankruptcy proceedings, three claims totalling EUR 1,244.69 were filed, and the amount of EUR 81.11 was paid on the basis of bankruptcy distributions from earlier proceedings. HAKOM also filed for one claim in a pre-bankruptcy procedure (EUR 3,225.54).

10 Values for some Member States have been reduced for presentational purposes (PT 2023 = 2,830; CY 2023 = 3,285). The average is weighted by the number of cases in the respective year. The number of cases varies by Member State. The empty column indicates that the Member State did not report any cases for that year. In some cases, due to the limited number of relevant cases (CZ, DK, IE, ES, LV, AT, PT), the annual figures can be highly dependent on the duration of an exceptionally long-term or short-term case, so that differences between consecutive years can be large. In DK, an informal court authority is competent for first instance appeals. In ES, AT and PL, different courts have jurisdiction, depending on the subject matter of the case.

10.7 COMPETENCE DEVELOPMENT AND BUSINESS PROCESSES IMPROVEMENT

In 2025, business processes management was further consolidated as HAKOM's regular and systematic activity. A comprehensive analysis and alignment of business processes with the new organisational structure and job systematisation was carried out. In accordance with the plan, in all, 160 business processes were analysed and aligned. In the course of the year, optimisation and digitalisation activities continued, enhancing existing and developing new digital business solutions with the aim of increasing operational efficiency and productivity.

In the area of project management, the established methodology for planning, monitoring and implementing projects was continued. In 2025, all active projects were aligned with the defined methodology. The aim is to ensure standardisation of approach, greater transparency and effective management of project outcomes and resources.

10.7.1 Quality management system

In order to further improve the quality of its operations, HAKOM continued to apply the Common Assessment Framework (CAF) in 2025 as the basic quality management model in the public sector. The application of this model places emphasis on implementing improvement initiatives in areas identified during the previous self-assessment cycles.

During the year, an internal assessment of the quality system was carried out, during which key areas for improvement were identified. These findings served as the basis for planning and implementing further improvements, in line with the principles of continuous improvement and organisational excellence.

As part of strengthening systematisation and standardisation, the standardisation of forms for preparing internal and external reports was implemented, including forms for quarterly market indicators, as well as other internal and external documents. This has resulted in greater uniformity of the content and structure of reports, reduced the likelihood of errors and ensured consistency in the preparation of documentation.

Particular attention was paid to strengthening the user-oriented approach. In this context, the development of a methodology for measuring the satisfaction of HAKOM's service users was initiated. The aim is to lay the foundations for systematically monitoring user perception and improving service quality. Given the stage of development and implementation, the results of applying the methodology will be included in the report for the next reporting period.

10.8 E-AGENCY

The e-Agency programme is based on the digitalisation of operations, which requires numerous application systems. The application systems are designed for external and internal users and are essential to HAKOM's agile operations. HAKOM is constantly working on improving and modernising the existing application systems and, according to needs, introducing new ones. Additionally, existing applications are regularly maintained.

In 2025, a digital platform was established for the electronic collection of electromagnetic field (EMF) measurements. The aim is to collect measurement data with an official report in PDF format for the public, to publish the collected data on a GIS browser, and to enable the Ministry of Health and other interested parties to download the collected data. A performance management tool has also been integrated, enabling the structured setting and monitoring of objectives.

Cybersecurity

A series of activities and measures were implemented to enhance the cybersecurity and reliability of HAKOM's external and internal services. The aim is to be able to respond effectively to the increasingly prevalent security threats in cyberspace. Throughout the year, actions were taken to raise employees' awareness of the importance of cybersecurity and to check the current state of cybersecurity of the entire information system. A simulated phishing campaign (a campaign of impersonation) was conducted with the aim of assessing the level of employees' awareness and resilience to social engineering attempts. The campaign was carefully designed for HAKOM and its employees to simulate real-life phishing attack scenarios by sending credibly formatted e-mails containing elements typical of malicious attempts (opening links, requesting user details).

10.9 REALISATION OF PLANNED ACTIVITIES

Other HAKOM's activities in 2025							
No.	Strategic goal/ priority	Activity	Planned indicators and outcomes	Planned/ realised completion (quarter)	Fina-ncial Plan	Realised outcome	Impleme-ntation assessment and recomme-ndations
1.	4.2	Prepare a report on the implementation of the Annual Inspection Plan for 2024	Report on the implementation of the Annual Inspection Plan for 2024	II/II	N	Internal report prepared	Achieved
2.	4.2	Implement the Annual Inspection Plan for 2025	Implementation according to the Annual Plan and identified needs	IV/IV	N	72 inspection decisions issued	Achieved
3.	2.1	Draft the Annual Inspection Plan for 2026	Annual Inspection Plan for 2026	IV/IV	N	Internal Inspection Plan prepared	Achieved
4.	5.1	Prepare the annual report and the financial statements for 2024 and submit them to the Croatian Parliament	Annual Report and Financial Statements for 2024	II/II	N, 3237, 3239	2024 Report adopted by the Parliament	Achieved
5.	5.1	Prepare the annual work programme and the financial plan for 2026	Annual Work Programme and the Financial Plan for 2026	IV/I 2026	N, 3237, 3239	Annual Work Programme for 2026 adopted	Achieved
6.	5.1	Analyse and harmonise business processes	All processes that were subject to change analysed and harmonised	Ongoing	N	All processes analysed and harmonised according to plan (in all, 160 processes)	Achieved
7.	5.1	Manage projects	Projects comply with the established project methodology	Ongoing	N	Projects complied with the established methodology	Achieved

8.	5.1, 5.2	Implement internal quality system assessment	Areas for improvement identified	IV/IV	N	Internal assessment implemented and areas for improvement identified	Achieved
9.	5.1	Update web and intranet sites and other digital communication platforms	Relevant and timely information for the public	Ongoing	N, 3238	Web and intranet sites updated according to plan	Achieved
10.	5.1, 5.2	Develop and maintain e-Agency services	New e-Agency services added and existing ones upgraded	Ongoing	N, 3238, 454	3 new services added, 9 e-Agency services upgraded, availability > 99% of the time	Achieved
11.	5.1, 5.2, 5.3	Prepare HAKOM's Strategy for 2026 – 2029	HAKOM's Strategy 2026 – 2029	IV/III	N	HAKOM Strategy 2026 – 2028 adopted	Achieved
12.	5.2	Develop organisational culture	Stimulating organisational culture	IV/IV	N, 3237	7 initiatives aimed at strengthening organisational culture selected and implemented	Achieved
13.	5.3	Develop competences in accordance with HAKOM's competence framework	Competences developed	Ongoing	N	214 trainings conducted	Achieved
14.	5.3	Prepare Human Resources Strategy	HR Strategy	IV/-	N	Preparatory activities carried out	Proceeding as planned
15.	4.1	Monitor the regulatory framework	Framework analysis	Ongoing	N	Seven regulatory frameworks analysed	Achieved
			Proposals of positions			39 positions	
16.	4.1, 4.3	Issue expert opinions	Expert opinions	Ongoing	N	1 expert opinion	Achieved

11

FINANCIAL STATEMENTS

The Croatian Regulatory Authority for Network Industries (HAKOM), pursuant to Article 20, paragraph (1), item (6) of the Electronic Communications Act (Official Gazette 76/2022 and 14/2024; hereinafter ECA) and Article 10 of the Statute of HAKOM (Official Gazette 40/2024), submits to the Croatian Parliament and the Government of the Republic of Croatia the Financial Report for the year 2025. This report constitutes an integral part of the HAKOM 2025 Annual Activity Report.

HAKOM is an autonomous and independent legal entity that performs regulatory and other tasks as a public authority in accordance with the laws for the implementation of which it is competent. Its scope of work primarily includes the ECA, the Postal Services Act (Official Gazette 144/2012, 153/2013, 78/2015 and 110/2019; hereinafter: PSA), the Railways Act (Official Gazette 32/2019, 20/2021 and 114/2022; hereinafter: RA), the Act on the Regulation of Rail Services Market and the Protection of Passenger Rights in Rail (ARRSM) (Official Gazette 104/2017 and 31/2025) and the Act on the Implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) (Official Gazette 67/2025). HAKOM also participates in the implementation of other laws and subordinate legislation.

In accordance with the ECA, the founder of HAKOM is the Republic of Croatia, and the founding rights are exercised by the Croatian Parliament and the Government of the Republic of Croatia. HAKOM is accountable for its work to the Croatian Parliament. HAKOM is governed by a five-member Council, appointed and dismissed by the Croatian Parliament on the proposal of the Government of the Republic of Croatia. Members of the Council are appointed for a five-year term and may be reappointed. HAKOM's administrative and technical affairs are performed by the Administrative Service headed by the Executive Director of HAKOM.

HAKOM is a budget user of the state budget, representing the third organisational level and belonging to a single division heading. HAKOM falls within the scope of work of the Ministry of the Sea, Transport and Infrastructure as the line ministry. In accordance with the Act on Execution of the State Budget of the Republic of Croatia for 2025 (Official Gazette 149/2024, 134/2025 and 136/2025), HAKOM plans its assigned revenues in the state budget, while the obligation to pay these revenues into the state budget does not apply to HAKOM. The realisation and expenditure of assigned revenues, as well as EU aid and revenues from the sale of non-financial assets and insurance premiums, are reported monthly in the State Treasury system. HAKOM's Financial Plan for 2025 was adopted in accordance with budgetary regulations as part of the budget of the Ministry of the Sea, Transport and Infrastructure.

Register of budget users: 45902
Level: 11 – State budget user; Chapter: 06565 Croatian Regulatory Authority for Network Industries
Programme: 3107 Development of the postal services and electronic communications markets
Activity: A917001 Administration and management (from recorded revenues)
Activity: 8413 Regulation of and contribution to more efficient operation of businesses

In 2025, HAKOM realised assigned revenues, EU aid and other revenues in the total amount of EUR 17,032,668.67, which were sufficient to cover all of HAKOM's expenditures amounting to EUR 15,588,610.41. The total surplus of revenues was recorded in 2025 in the amount of EUR 1,444,058.26, which resulted in an increase in the surplus of revenues carried forward from previous years. The surplus of revenues available for the coming period is planned to be used to finance part of the expenditure on the acquisition of non-financial assets.

11.1 HAKOM'S ANNUAL FINANCIAL STATEMENTS FOR 2025

Entities subject to budget accounting and preparing financial statements in the budget system prepare and submit the annual financial statements for 2025 in accordance with the provisions of the Ordinance on financial reporting in budgetary accounting (Official Gazette 37/2022, 52/2025 and 156/2025).

HAKOM's annual financial statements for 2025 were submitted on 30 January 2026 via the Ministry of Finance's online application (Financial reporting in the budget system and the Register of budgetary and extra-budgetary users – RKPFI) and to the line ministry.

Electronically signed HAKOM's Annual Financial Statements for 2025 were published on 2 February 2026 on HAKOM's website:
Budget statements, budget and extra-budgetary user statements for the period: 1 January 2025 – 31 December 2025 – Reference page

1. Balance Sheet as of 31 December 2025 – Form: BALANCE SHEET
2. Statement of revenue and expenditure, receipts and expenses for the period: 1 January 2025 – 31 December 2025 – Form: PR-RAS
3. Statement of expenditure by functional classification for the period: 1 January 2025 – 31 December 2025 – Form: RAS-functional
4. Statement of changes in the value and volume of assets and liabilities for the period: 1 January 2025 – 31 December 2025 – Form: P-VRIO
5. Statement of liabilities for the period: 1 January 2025 – 31 December 2025 – Form: LIABILITIES
6. Statement of EU funds for the period: 1 January 2025 – 31 December 2025 – Form: EU report
7. Notes to HAKOM's Financial Statements for the period 1 January 2025 – 31 December 2025

In the Notes to the Financial Statements, the largest items are described and the more important changes that occurred relative to the previous period are explained.

11.2 REVENUES

HAKOM's revenues are ensured based on HAKOM's annual financial plan, in compliance with the ECA, the PSA and the RA, from the following sources:

1. from the fee for the radiofrequency spectrum management
2. from the fee for the addressing and numbering space management
3. from the fee for the performance of other activities of HAKOM in the percentage of the total annual gross revenues generated by operators in the previous calendar year in the activities of electronic communications networks and services on the market, except broadcasters broadcasting their radio or television programmes through their own electronic communications networks, which they use solely for this purpose
4. from postal services fees, as a percentage of total annual gross revenues generated by postal service providers in the previous calendar year
5. from the fee for performing activities in the field of rail market regulation, as a percentage of the total annual gross revenues generated by infrastructure managers in the previous calendar year.

In addition to the specified assigned revenues, HAKOM may also generate revenues from other sources in accordance with special laws, and those revenues may be used in accordance with the act governing the planning, preparation, adoption and execution of the budget.
The calculation and amount of fees, and the manner of payment of fees for the financing of HAKOM's activities are laid down in the Ordinance on the payment of fees for the performance of HAKOM's activities, adopted by the Council of HAKOM. The fees are established pursuant to the principles of objectivity, transparency, proportionality and non-discrimination. A public consultation procedure is conducted before the adoption of the Ordinance.

In the period from 1 January to 31 December 2025, HAKOM realised operating revenue (class 6) of EUR 17,032,668.67. In the mentioned period, no revenues from the sale of non-financial assets (class 7) were realised, nor were receipts from financial assets and liabilities (class 8).

The table below presents an overview of HAKOM's realised revenues in 2025 up to the level of the sub-group.

Table 5. HAKOM's revenues (in EUR)

Account from Accounting Plan	HAKOM revenues	Realised in 2025
63	**Aid from abroad and from entities within the general budget**	**42,540.26**
632	Aid from international organisations and EU institutions and bodies	42,540.26
64	**Revenues from assets**	**2,952.33**
641	Revenues from financial assets	2,952.33
65	**Revenues from operating and administrative fees, fees pursuant to special legislation and fees**	**16,948,519.11**
652	Revenues pursuant to special regulations	16,948,519.11
68	**Penalties, administrative measures and other revenues**	**38,656.97**
683	Other revenues	38,656.97
6	**Operating revenues**	**17,032,668.67**
7	**Revenues from the sale of non-financial assets**	**0.00**
	HAKOM TOTAL REVENUES	**17,032,668.67**

Aid from abroad and from entities within the general budget (63)
Aid from abroad and from entities within the general budget consists of current aid from EU institutions and bodies in the form of refunds for official travel expenses incurred in 2025, amounting to EUR 42,540.26. HAKOM's experts participated in 65 meetings of working groups, plenary meetings, workshops and forums relating to the areas of electronic communications and postal and rail services. Of the total amount of EU aid, EUR 21,823.08 relates to the refund of official travel expenses for participation in 31 BEREC meetings (the Body of European Regulators for Electronic Communications). The remaining EUR 20,717.18 was realised through participation in 34 meetings organised by other EU institutions and bodies (RSC – Radio Spectrum Committee, RSPG – Radio Spectrum Policy Group, EBDS – European Board for Digital Services, ERGP – European Regulators Group for Postal Services, PDC – Postal Directive Committee, ENRRB – European Network of Rail Regulatory Bodies, etc.). In 2025, the realisation was lower compared to the previous year's observed period due to fewer official trips for which the travel expenses were

refunded. This is because in 2024, the Chairman of the HAKOM Council, Mr Tonko Obuljen, was the Chair of BEREC, which required significant involvement from HAKOM experts through participation in a greater number of BEREC meetings. In 2025, those activities were reduced.

Revenues from assets (64)
Revenues from financial assets relate to interest income on demand deposits and income from default interest totalling EUR 2,952.33. Default interest was regularly calculated and collected from business entities that failed to settle their liabilities towards HAKOM until the maturity date and was realised in the amount of EUR 2,499.00. Interest on demand deposits was not materially significant due to low interest rates of the commercial bank.

Revenues from operating and administrative fees, fees pursuant to special legislation and fees (65)
Revenues from operating and administrative fees, fees under special legislation and fees comprise revenues under special legislation, which in 2025 amounted to EUR 16,948,519.11, representing 99.51% of total operating revenues.

Table 6. Revenues pursuant to special legislation (in EUR)

No.	Revenues pursuant to special legislation	Realised in 2025
1	Revenues from the fees for the radiofrequency spectrum management	7,525,260.24
2	Revenues from the fees for the addressing and numbering space management	898,140.00
3	Revenues from the fees for the performance of other activities of HAKOM in the percentage of the total annual gross revenues of the operators in the previous calendar year in the activities of electronic communications networks and services on the market, except for broadcasters broadcasting their radio or television programmes through their own electronic communications networks, which they use solely for this purpose	6,814,824.04
4	Revenues from the fees for the performance of HAKOM's activities in the field of postal services as a percentage of total annual gross revenues generated by postal service providers in the previous calendar year	980,128.91
5	Revenues from the fees for performing HAKOM's activities in the field of rail market regulation, as a percentage of the total annual gross revenues generated by infrastructure managers in the previous year	704,078.74
6	Other revenues from operating and administrative fees	26,087.18
	TOTAL	**16,948,519.11**

The most significant part of revenues pursuant to special legislation consists of fees for the radiofrequency spectrum management and fees for the performance of other activities of HAKOM in the percentage of the total annual gross revenues generated by operators in the previous calendar year in the activities of electronic communications networks and services on the market, except for broadcasters broadcasting their radio or television programmes via their own electronic communications networks, which they use solely for this purpose.

Revenues pursuant to special legislation, which constitute the most significant revenues for the performance and development of HAKOM's activities, increased by 7.69% in 2025 compared to the 2024 figure. The increase in revenues was the result of the increase in annual gross revenues generated in the previous calendar year by operators in the performance of activities of electronic communications networks and services, postal service providers and the infrastructure managers from the provision of rail services. Also, fees for performing HAKOM's activities in the field of rail market regulation increased from 2.65% to 3.75% of the total annual gross revenues generated by infrastructure managers, which were generated in the previous calendar year from the provision of rail services under the Ordinance on the payment of fees for the performance of HAKOM's activities (Official Gazette 151/2024), applicable from 1 January 2025. The increase in revenues was also accounted for by a higher collection of fees for the use of the radiofrequency spectrum for a public electronic communications network, for which invoices were issued in the second half of 2024, with due date and actual collection in 2025.

Penalties, administrative measures and other revenues (68)
Other revenues of EUR 38,656.97 relate mainly to the reimbursement of employees' severance payments based on a court ruling and to a payment from the French electronic communications regulator, which remitted funds to HAKOM because of the participation of HAKOM's experts in the radiofrequency spectrum control conducted during the Paris Olympic Games. Revenues from employees for the use of the Multisport Card were also recorded on account 683.

11.3 EXPENDITURES

In the period from 1 January to 31 December 2025, HAKOM's total expenditure amounted to EUR 15,588,610.41. Operating expenditure (class 3) amounted to EUR 14,723,384.04, and expenditure for the acquisition of non-financial assets (class 4) amounted to EUR 865,226.37. During the period, no expenditure was incurred on financial assets and loan repayments (class 5).

The table below shows HAKOM's actual expenditures in 2025 by area (electronic communications, postal services and rail market regulation).

Tablica 7. Rashodi HAKOM-a (u eurima)

Account from Accounting Plan	HAKOM expenditure	HAKOM	Electronic communications area	Postal services area	Railway market regulation services area
31	**Employee expenses**	**9,821,540.95**	**8,888,633.69**	**549,715.77**	**383,191.49**
311	Salaries (gross)	7,416,159.66	6,718,975.15	408,706.67	288,477.84
312	Other employee expenses	1,178,066.40	1,059,304.76	72,230.42	46,531.22
313	Contributions on salaries	1,227,314.89	1,110,353.78	68,778.68	48,182.43
32	**Material expenditure**	**4,881,760.84**	**4,413,417.94**	**296,087.30**	**172,255.60**
321	Compensations of expenses to employees	613,327.75	540,015.48	42,003.81	31,308.46
322	Expenditures for materials and energy	337,183.37	305,675.86	18,546.17	12,961.34
323	Expenditure for services	3,670,009.80	3,319,336.71	230,055.58	120,617.51
324	Compensation of expenses to unemployed persons	165.80	165.80	0.00	0.00
329	Other unmentioned operating expenditure	261,074.12	248,224.09	5,481.74	7,368.29
34	**Financial expenditure**	**20,082.25**	**19,256.86**	**485.40**	**339.99**
343	Other financial expenditure	20,082.25	19,256.86	485.40	339.99
3	**OPERATING EXPENDITURE**	**14,723,384.04**	**13,321,308.49**	**846,288.47**	**555,787.08**
42	**Expenditure on the acquisition of produced long-term assets**	**646,837.38**	**646,837.38**	**0.00**	**0.00**
422	Plant and equipment	501,500.08	501,500.08	0.00	0.00
426	Intangible produced assets	145,337.30	145,337.30	0.00	0.00
45	**Expenditure for additional investments on non-financial assets**	**218,388.99**	**218,388.99**	**0.00**	**0.00**
451	Additional investments in buildings	12,367.26	12,367.26	0.00	0.00
452	Additional investments in plant and equipment	28,252.85	28,252.85	0.00	0.00
454	Additional investments in other non-financial assets	177,768.88	177,768.88	0.00	0.00
4	**EXPENDITURE ON THE ACQUISITION OF NON-FINANCIAL ASSETS**	**865,226.37**	**865,226.37**	**0.00**	**0.00**
	EXPENDITURE TOTAL	**15,588,610.41**	**14,186,534.86**	**846,288.47**	**555,787.08**

Within HAKOM's total expenditure, the largest share is accounted for by employee expenses, amounting to EUR 9,821,540.95, while the second-largest category is material expenditure, which in 2025 amounted to EUR 4,881,760.84. The most significant material expenditure relates to expenditure for services, of which the most significant is the expenditure for rents and leases. These are followed by expenses for intellectual and personal services, computer services, regular and investment maintenance services, other services, etc.

In 2025, financial resources were spent on the following:

1. **OPERATING EXPENDITURE (class 3)**

a) **employee expenditure (group 31)** in the amount of EUR 9,821,540.95, which relates to the payment of salaries and other employee expenses. The increase in employee expenditure of 15.51% from the previous year is the result of the increase in the total amount of the length-of-service allowance cost, the adjustment of salaries to inflation, the internal restructuring, systematisation of jobs and salary adjustments for employees in mid-2024. In 2024, HAKOM began applying the salary calculation base in accordance with the Law on Salaries in the Civil Service and Public Services (Official Gazette 155/2023), which was increased on 1 February 2025 and 1 September 2025

b) **material expenditure (group 32)** in the amount of EUR 4,881,760.84.

I. **Compensation of expenses to employees (sub-group 321)** was mostly accounted for by official travel expenses, employee transport costs, separation allowance and professional development of employees.

The costs of official travel increased by 1.44% from the same period in 2024 due to higher transport allowances for official travel in the country and abroad. Foreign official travel was mostly related to participation in meetings of the working groups of EU institutions and bodies.

Professional development of employees in 2025 amounted to EUR 101,514.44 and referred to participation in conferences and symposia, training for the development of management staff, the development of specific and personal employee competencies (professional seminars, consultations and workshops), professional examinations, AI education and information security training.

II. **Expenditures for materials and energy (sub-group 322)** refer to electricity and heat energy, fuel, office supplies and other material costs, official, work and protective clothing and footwear, car tyres, etc.

The reduction in energy consumption in 2025 was driven by lower consumption of electricity, heat energy and fuel. In addition to reduced consumption, the decrease in electricity costs was also due to lower prices in 2025 compared with 2024, thanks to the subsidies granted by the Government of the Republic of Croatia.

Office supplies and other material expenses comprise stationery, literature, cleaning supplies and other materials for regular business operations. In 2025, protective clothing and footwear were purchased for employees working in positions with special working conditions. Additionally, four sets of summer tyres and eight sets of winter tyres were procured for the official vehicles.

III. **Expenditures for services (sub-group 323)** consist mainly of rents and lease payments, intellectual and personal services, computer services, regular and investment maintenance services and other services.

Rents and lease payments relate to the lease of business and parking space in Zagreb, as well as the lease of equipment and licences. Realisation was higher than in the observed period of 2024 due to the acquisition of new licences and the implementation of indexation of the lease price for the Sky Office business premises in 2025.

Intellectual and personal services in 2025 amounted to EUR 623,008.24, increasing compared to the observed period of the previous year. In 2025, intellectual and personal services included consultation services and provision of regulatory information, MS test consultation services covering the review and amendment of methodology and MST models, support services for the development of the Mobile Virtual Network Operator (MVNO) modality access and the development of a model that will enable HAKOM to assess the possibility of economically replicating the retail offers of the network operator that provides the MVNO access, preparing the report on the quality of services in public mobile networks, consultation services for a security GAP analysis, market research service – malicious calls and messages, research services on the satisfaction and needs of postal service users (individual users), market research services on the use of and satisfaction with internet services, audit services for the report on the quality of the performance of universal service for 2024, audit services for the regulatory report of the universal service provider, verification services for the accuracy of the net cost calculation of the universal service provider, the 2025 Accessibility Project – development of an accessible AI assistant for customer support in the area of electronic communications, consultation services for the improvement and management of business processes, consultation services in the area of human resource management, services for analysing the state of SharePoint servers, legal services, translation services and student services.

Computer services refer to the support and maintenance services for computer systems (Centrix, HRNet, Business Central, CHIRplus BC and Spectra, eLicences, Intranet, eOffice, Consultation, eOperator, Do Not Call Register, web applications, Data security backup system, Market analysis system (SAT), E-mail protection system, GIS portal, HAKOMetar Plus, Time&Space working time record application, MS platform, firewall system), membership access to CIX centre usage services, optical character recognition and personal data removal services, etc.

Regular and investment maintenance services relate to the services of regular and investment maintenance of official vehicles, IT systems, measuring and control devices for the purposes of monitoring and managing the radiofrequency spectrum, as well as control and measuring centres and control and measuring stations, monthly common maintenance costs for the Sky Office building in which HAKOM has leased business premises.

Other services included cleaning service and common area costs in the leased business premises in Zagreb, archiving services, media coverage of releases, official vehicle washing services, maintenance of anti-theft alarm and fire detection systems, Multisport etc.

IV. **Other unmentioned operating expenditure (sub-group 329)** mainly relates to insurance premiums for vehicles, other property and employees, and to representation expenses (organisation of Safer Internet Day for children, Day of New Technologies, Electronic Communications Market Day, Railway Services Day, Postal Services Market Day, BCO workshops, IRG Rail workshops, International Conference “Accessible Future”, annual meeting with consumer protection associations, HCM Agreement working group meetings, strategic meetings, reception for external associates, hosting and gifts for business partners).

c) **financial expenditure (group 34)** in the amount of EUR 20,082.25, which relates to default interest calculated and paid to an employee pursuant to a court judgement for the payment of outstanding wages and other material entitlements, banking services, payment services, and negative exchange rate differences.

2. XPENDITURE ON THE ACQUISITION OF NON-FINANCIAL ASSETS (class 4)

a) **expenditure on the acquisition of produced long-term assets (group 42)** in the amount of EUR 646,837.38, which relates to expenditure on the procurement of office equipment and furniture (computers, monitors, computer network switches and a server, a firewall system, an uninterruptible power supply system, portable battery power supplies, room occupancy display units, office furniture, classroom equipment and freestanding

coustic screens for the business premises), communications equipment (mobile devices for employees and microwave radio links on the CMS Osijek – CMS Degman and Sljeme – CMS Zrinska gora routes), maintenance and protection equipment (air-conditioning units, a server room camera), instruments and devices (uninterruptible power supply (UPS) units, antenna control units, scanner for GSM/WCDMA/LTE/NR networks) and investments in software (MATLAB software, e-data collection system, Rohde & Schwarz SmartAnalytics system and unified data collection system).

b) **expenses for additional investments on non-financial assets (group 45)** in the amount of EUR 218,388.99, which consists of additional investments in buildings (works to improve the earthing of CMS Osorščica), additional investments in equipment (upgrade of computer servers, firewall systems and videoconferencing systems) and additional investments in other non-financial assets (upgrade of the e-Operator application, Central Administrative Database of Ported Numbers (CADPN) system, activity recording and replaying application – RPA robot, Privacy Calculator, HAKOM web portal, Cisco ISE Plus system, market analysis system, e-data collection system, BI application for data visualisation and analysis, working time record application and the upgrade of Business Central software).

11.4 SURPLUS REVENUE

On 1 January 2025, HAKOM had surplus operating revenue of EUR 5,090,542.81 and deficit in revenues from non-financial assets of EUR 1,161,507.14 recorded on its basic accounts under sub-group 922 in the Balance Sheet.

Since from 1 January 2025, accounting entries in the business books are made in accordance with the provisions of the new Ordinance on budgetary accounting and Accounting Plan, in early 2025, a deficit of EUR 99,556.47 was recorded in receipts from financial assets and budget sources for financial assets, relating to security deposits paid to the lessor of the Sky Office business premises in Zagreb as a guarantee for the regular payment of rent and the costs of common consumption.

In February 2025, a Decision on the reallocation of results was adopted, whereby the deficit in revenues from non-financial assets in the amount of EUR 1,161,507.14 was fully covered by the surplus operating revenue. In July 2025, a Decision was adopted to amend the operating results due to the write-off of an obsolete liability of HAKOM in the amount of EUR 286.84. Following the implementation of the Decisions, the remaining surplus operating revenue amounted to EUR 3,929,322.51, while the deficit in receipts from financial assets remained at EUR 99,556.47.

After determining the results for each of the activities for 2025 and after offsetting the surpluses and deficits by similar categories and sources of financing, in 2025 a surplus operating revenue of EUR 2,309,284.63 and a deficit in revenues from non-financial assets of EUR 865,226.37 were realised. In 2025, the conditions for applying any of the prescribed mandatory adjustments of results were not met, so as at 31 December 2025, surplus operating revenues totalling EUR 6,238,607.14, a deficit in revenues from non-financial assets of EUR 865,226.37 and a deficit in receipts from financial assets of EUR 99,556.47 were recorded.

In February 2026, a Decision on the reallocation of results was adopted, whereby the deficit in revenues from non-financial assets in the amount of EUR 865,226.37 was fully covered by surplus operating revenues. Following the implementation of the Decision on the reallocation of results on the basic accounts of sub-group 922 in the Balance Sheet, surplus operating revenue totalling EUR 5,373,380.77 and a deficit in receipts from financial assets in the amount of EUR 99,556.47 were recorded.

11.5 EXECUTION OF HAKOM'S FINANCIAL PLAN FOR 2025

The execution of the budget, i.e. the financial plan, is defined in the Act on Execution of the State Budget of the Republic of Croatia for 2025 and the Ordinance on semi-annual and annual reporting on the execution of the budget and the financial plan (Official Gazette 85/2023). HAKOM's financial resources were spent in accordance with the planned activities, and the realisation and expenditure of revenues were reported on a monthly basis in the State Treasury system.

The Council of HAKOM adopted the Annual Report on the Execution of the Financial Plan of HAKOM for 2025, which was published on HAKOM's website on 26 March 2026.

The tables below provide summary data on the execution of the Financial Plan of HAKOM for 2025, while all prescribed data are contained in the aforementioned Annual Report on the Execution of the Financial Plan of HAKOM for 2025.

Table 8. Execution of the Financial Plan of HAKOM for 2025 (in EUR and %)

	Execution 2024 (EUR)	Plan 2025 (EUR)	Execution 2025 (EUR)	Index execution 2025/plan 2025	Index execution 2025/execution 2024
3107 – Development of the postal services and electronic communications markets	13,791,728.85	18,234,850.00	15,580,448.69	85.44	112.97

Table 9. Execution of the Financial Plan of HAKOM for 2025 – analytics (in EUR and %)

Account from Accounting Plan	Description	Plan	Realised	%
3	Operating expenditure	16,759,920	14,713,788.57	87.79
31	Employee expenses	10,538,424	9,760,017.97	92.61
32	Material expenditure	6,200,996	4,933,734.26	79.56
34	Financial expenditure	12,500	20,036.34	160.29
38	Other expenditure	8,000	0.00	0.00
4	Expenditure on the acquisition of non-financial assets	1,474,930	866,660.12	58.76
41	Expenditure on the acquisition of non-produced long-term assets	60,916	0.00	0.00
42	Expenditure on the acquisition of produced long-term assets	911,639	649,831.13	71.28
45	Expenses for additional investments on non-financial assets	502,375	216,828.99	43.16
3 + 4	**EXPENDITURE TOTAL**	**18,234,850**	**15,580,448.69**	**85.44**
6	Operating revenues	16,511,700	17,032,668.67	103.16
63	Aid from abroad and from entities within the general budget	50,000	42,540.26	85.08
64	Revenues from assets	11,430	2,952.33	25.83
65	Revenues from administrative and operating fees	16,413,970	16,948,519.11	103.26
68	Penalties, administrative measures and other revenues	36,300	38,656.97	106.49
7	Revenues from the sale of non-financial assets	1,300	0.00	0.00
72	Revenues from the sale of produced long-term assets	1,300	0.00	0.00
6 + 7	**TOTAL INCOME**	**16,513,000**	**17,032,668.67**	**103.15**

When preparing financial plans and monitoring budget execution, modified accrual basis is not applied; instead, revenues and expenditures are reported exclusively on a cash basis. For this reason, the data in Table 9 Execution of the Financial Plan of HAKOM for 2025 – analytics differ from the data in Table 7 HAKOM's expenditure.

The Budget Act gives flexibility in the execution of assigned revenues, so that it prescribes the possibility of their execution in amounts higher than planned, and the limit is set at the level of revenue generation, that is, up to the amount paid. In order to ensure liquidity for HAKOM's proper operation, it is necessary to generate a certain surplus of revenues carried forward at the end of each business year for the purpose of financing current expenditures in the first four months of the following year as they are higher than current revenues in the in the relevant period.

ABBREVIATIONS

5G – 5th Generation Mobile Network
ADSL – Asymmetric Digital Subscriber Line
ARRSM – Act on the Regulation of Rail Services Market
BCO – Broadband Competence Office
BEREC – Body of European Regulators for Electronic Communications
BIDP – Broadband Infrastructure Development Plan
CADPN – Central Administrative Database of Ported Numbers
CAFP – Competent Authority for the Framework Programme
CARNET – Croatian Academic Research Network
CBEIPR – Coordination Board for the Enforcement of Intellectual Property Rights
CCA – Cybersecurity Act
CCE – Croatian Chamber of Economy
CEF (Connecting Europe Facility) – EU funding instrument to promote growth
CERT – Computer Emergency Response Team
CFCA – Central Finance and Contracting Agency
CIX – Croatian Internet Exchange
CPA – Consumer Protection Act
DAB+ – Digital Audio Broadcasting
DMA – EU Digital Market Act
DNA – Digital Network Act
DOCSIS – Data Over Cable Service Interface Specification
DSA – Digital Services Act
DVB-T2 – Digital Video Broadcasting –Terrestrial2
EaPeReg – Eastern Partnership Electronic Communications Regulators Network
EBDS – European Board for Digital Services
EC – European Commission
ECA – Electronic Communications Act
ECI – Electronic Communications Infrastructure
EMERG – European Mediterranean Regulators Group
EMF – electromagnetic field
ENISA – European Network and Information Security Agency
ERGP – European Regulators Group for Postal Services
EU – European Union
FER – Faculty of Electrical Engineering and Computing, University of Zagreb
FM – Frequency Modulation
FNP – Framework National Programme
FPZG – Faculty of Political Science of Zagreb University
FTTH – Fibre To The Home
FTTH/B/DP/P – Fiber to different access points

GIA – Gigabit Infrastructure Act
GIS – Geographic Information System
HAKOM – Croatian Regulatory Authority for Network Industries
HCM – Harmonized Calculation Method
HEVC – High Efficiency Video Coding
IoM – Network Report
IRB – Ruđer Bošković Institute
IRG-Rail – Independent Regulators Group – Rail
ITU – International Telecommunication Union
LEO – Low Earth Orbit
LRSGU – local and regional self-government unit
LTE (Long Term Evolution) – advanced generation of 4G mobile networks
M2M – Machine to Machine
MESD – Ministry of the Economy and Sustainable Development
MJPADT– Ministry of Justice, Public Administration and Digital Transformation
MPP – minimum access package in the rail services market
MSTI – Ministry of the Sea, Transport and Infrastructure
MVNO – Mobile Virtual Network Operator
NPDCC – National programme for the development in the area of cybersecurity of communications
NRRP – National Recovery and Resilience Plan
OPCC – Operational Programme Competitiveness and Cohesion
OTT – over-the-top service
PSA – Postal Services Act
PwDs – persons with a disability
RA – Railway Act
RF – Radiofrequency
RIA – Regulatory Impact Assessment
RSPG – Radio Spectrum Policy Group
SOP – standard operating procedure
SRCE – University Computing Centre
UHF – Ultra High Frequency
USO – Universal Service Obligation
VDSL – Very-high-bit-rate Digital Subscriber Line
VHCN – Very High Capacity Network
VLOP – Very Large Online Platform
VOD – Video on Demand
WACC – Weighted Average Cost of Capital
xDSL – Digital Subscriber Line

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