

2026 ANNUAL WORK PROGRAMME

Croatian Regulatory Authority for Network Industries

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Foreword

The 2026 Annual Work Programme is the first operational document implementing the new [HAKOM's Strategy for the period 2026-2028](#). It is based on clearly set strategic objectives and priorities covering all regulatory areas – electronic communications with the radiofrequency spectrum and addressing and numbering space, and postal and rail services – while assuming new powers in the implementation of the Digital Services Act (DSA).

In the field of electronic communications, the emphasis is placed on strengthening competition, developing secure VHCNs and 5G networks and protecting users in the digital environment. In the postal sector, the main challenge is to align the existing regulatory framework with the ongoing market transformation and the needs of end-users, while in the rail services market, the focus is on compliance with the obligations when providing rail services, including protecting the rights of passengers and persons with reduced mobility. The implementation of the DSA has brought HAKOM the role of the national coordinator in the HR, which will require from HAKOM increased cooperation with other national and European bodies, as well as organizational adjustment. HAKOM is simultaneously faced with growing demands on its organisation: from digitalisation and process automation to developing new employee competences and the strengthening of institutional agility. That is why this program also contains clear organizational objectives, aimed at maintaining HAKOM's ability to act in complex and dynamic environments.

HAKOM remains a regulator which acts professionally and independently, aiming to protect the interests of users and ensure stable and competitive markets.

Council of HAKOM

Introduction

The Croatian Regulatory Authority for Network Industries (HAKOM) is a national regulatory authority for electronic communications markets as well as postal and rail services markets. It is also a national digital services coordinator. HAKOM is an independent and autonomous legal entity with public authority, accountable for its work to the Croatian Parliament. Most of the tasks and operations are performed as public powers pursuant to sectoral regulations. These primarily include the [Electronic Communications Act \(ECA\)](#), [Act on Measures to Reduce the Cost of Deploying High-speed Electronic Communications Networks](#), [Cybersecurity Act \(CSA\)](#), [Digital Services Act \(DSA\)](#), [Act on the Implementation of the Digital Services Act](#), [Gigabit Infrastructure Act \(GIA\)](#), [Postal Services Act \(PSA\)](#), [Act on the Regulation of Rail Services Market](#) and [the Protection of Passenger Rights in Rail Transport \(ARRSM\)](#), and the [Railway Act \(RA\)](#). The 2026 Annual Work Programme lays down operative objectives the aim of which is compliance with regulatory requirements, state strategies and plans, that is, meeting strategic objectives and achieving priorities determined by the HAKOM's Strategy for the period 2026-2028. All operative objectives are planned with measurable outcomes and are connected with the sources of financing for 2026.

HAKOM's 2026 Annual Work Programme has been developed as the first implementing document of the new HAKOM's [Strategy for the period 2026-2028](#), which was adopted to adapt regulatory, national and EU objectives to accelerated digital transformation, technological changes and ever increasing user and market demands. It ensures the continuity of key regulatory functions which were the basis of the previous HAKOM's Strategy for the period 2022-2025, such as protecting end-users and market competition and encouraging investment in the network infrastructure and innovation. The new Strategy further emphasises the need to strengthen HAKOM's capacity in the area of coordinating the implementation of the EU Digital Services Act and to further develop agile operation and competences that are needed for the AI era ahead.

The 2026 Annual Work Programme focuses on the operationalisation of new strategic priorities with responsibilities, which are structured and supported by measurable performance indicators. This ensures a cascading link between strategic and operational planning and a consistent implementation of medium/long-term objectives. Operational objectives are divided according to the priorities in the markets of electronic communications, postal services and rail services into the area related to user/passenger protection, national coordination of DSA implementation and HAKOM as a competent organisation that strives for business agility. In addition to operational objectives stemming directly from the Strategy and HAKOM's strategic priorities, a significant part of the annual work programme consists of regular regulatory, administrative and professional activities, which arise from its legal competences and operational needs of the business, but contribute to and are crucial for maintaining the functionality of the regulatory system, legal certainty of the market and for meeting the needs of users and service providers. These include, for example, issuing licences and consents, processing user complaints and resolving disputes, managing databases, supporting digital platforms and similar activities. Their systematic monitoring and evaluation also ensures the stability of regulatory activity and thus enables a timely response to operational challenges in the market.

HAKOM's strategic determinants

The Strategy for the upcoming three-year period from 2026 to 2028 lays down the following:

HAKOM'S role

HAKOM ensures that the markets for electronic communications, postal and rail services in the Republic of Croatia act in the interest of end-users and the society as a whole. By stimulating competition and through transparent regulation and efficient management of limited resources, HAKOM contributes to market stability and development. HAKOM has taken on an active role as a digital coordinator in the digital transformation and is preparing for new powers to keep the regulatory framework up to date with the technological progress and the needs of the digital society.

HAKOM's mission

HAKOM mission is to create a regulatory framework that fosters competition, protects users, enables innovation and a trusted online environment, and provides predictable conditions for investments.

HAKOM's vision

Reliable, accessible and competitive markets for network activities, which strengthen the connectivity and the development of the society.

Values

In order to accomplish its mission, HAKOM upholds the values that make it a recognisable and credible actor in the eyes of the public. These values are not only principles of operation, but also a framework of conduct that ensure the realisation of HAKOM's vision as an effective, reliable and professional regulator, integrated into all segments of HAKOM's activities, thus representing the key of its organisational culture and relationship with stakeholders.

- **Independence** – HAKOM operates autonomously and impartially, fostering high ethical standards and consistency, impartiality, objectivity and legality in decision-making. Decision-making independence is the cornerstone in the protection of public interests and a prerequisite for effective, consistent and credible regulatory activity.
- **Professionalism** – HAKOM continuously invests in the development of its employees. Decisions are taken professionally, on the basis of objective data and technical excellence, aiming to create a stable and supportive market environment.
- **Transparency** – Openness towards stakeholders and the public is key to building trust and ensuring accountability. HAKOM conducts consultations, provides access to information and communicates clearly about its activities and its decisions, and thus strengthens the legitimacy of the regulatory system.

Strategic objectives in the period 2026-2028:

1. **User protection and market availability** – users can reliably choose and use services with a high level of protection, availability of information and accessibility for all social groups.

1st priority: to strengthen users' trust by informing them, protecting their rights and monitoring service quality.

2nd priority: to maintain the availability and accessibility of services for all users, in particular for vulnerable user groups.

2. **Fostering competition and investment** – to ensure effective competition and clear and stable regulatory conditions.

1st priority: to foster investment and competition through a predictable regulatory framework.

2nd priority: to ensure efficient management of limited resources.

3rd priority: to strengthen the security and resilience of electronic communications networks and services.

3. **Regulatory excellence and compliance** – to contribute to the harmonisation of the regulatory environment of the Republic of Croatia with the EU regulatory framework by continuously improving regulatory practices and ensuring clear and efficient procedures.

1st priority: to ensure regulatory compliance with the EU framework and transparency in decision-making.

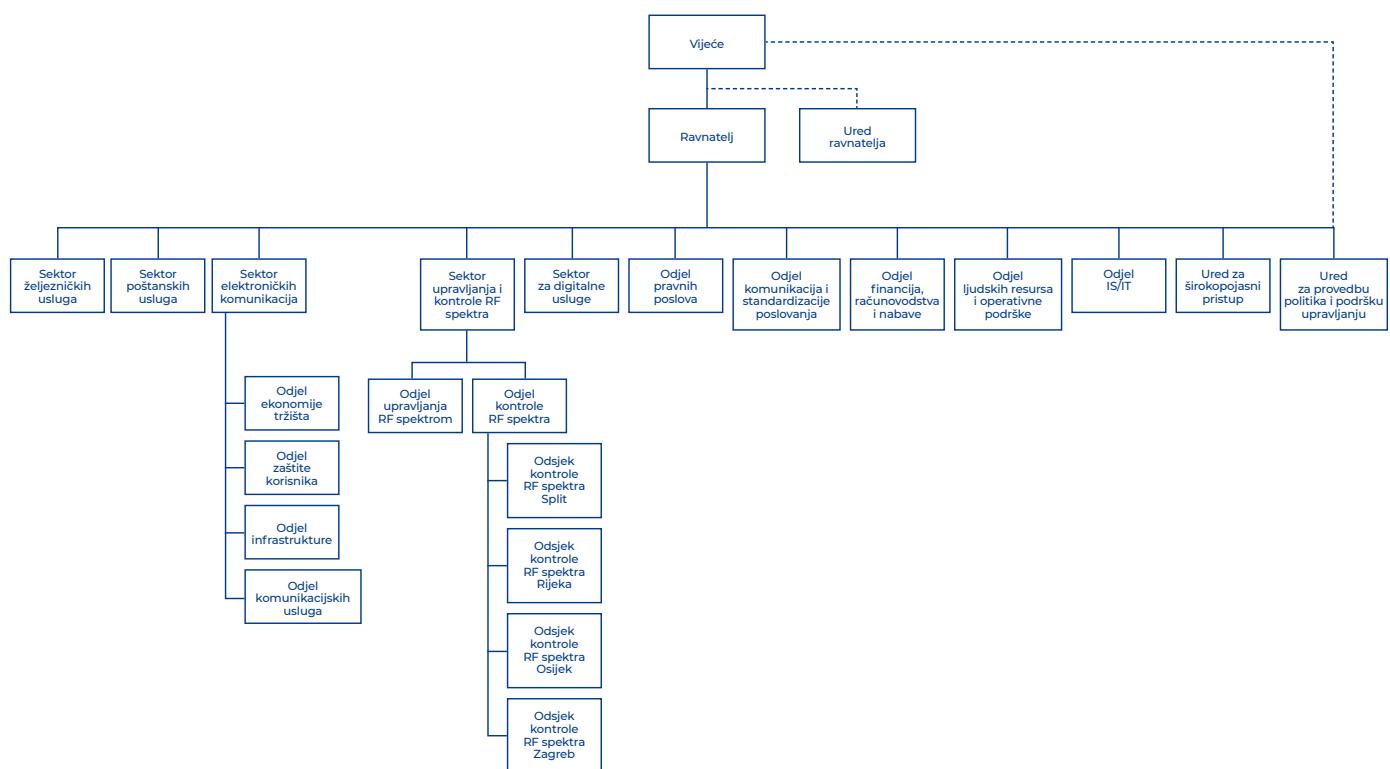
2nd priority: to ensure efficient oversight and implementation of regulations.

4. **Organisational agility and competence** – to develop an organisation which is capable of responding to regulatory challenges in the market in a timely and quality manner.

1st priority: to strengthen employee competencies and organisational efficiency.

2nd priority: to strengthen the transparency and visibility of regulatory activity.

HAKOM'S organisational structure in 2026:



HAKOM's operating context

In the time earmarked for the meeting of the strategic objectives under HAKOM's new Strategy for the period 2026-2028, HAKOM will enter a period of the strengthening of its regulatory role in the context of accelerated digital transformation, growing user demands and new or amended European regulatory frameworks. HAKOM's regulatory competence extends to three different but increasingly interconnected markets: electronic communications market, postal services markets and rail services markets, and also to managing the limited resources necessary for electronic communications, such as the radiofrequency spectrum and the addressing and numbering space, as well as to the new powers deriving from the Digital Services Act (DSA).

The electronic communications market is faced with the continuous development of advanced networks (VHCN, 5G, future 6G), the need for competitiveness, for ensuring the accessibility of services and for a high level of security of the communication and other critical infrastructure. The postal sector requires adapting to changes in demand, maintaining the universal service and its quality and encouraging competition in the parcel delivery segment. With regard to the rail market, the focus is on ensuring transparent and non-discriminatory access to infrastructure, on user/passenger rights and on compliance with EU legislative requirements. All three markets depend on satisfied users who regularly use these markets' services. However, the use of many of these services is becoming more and more technologically complex, while their transparency, accessibility and affordability of services remains a challenge.

Radiofrequency spectrum management remains a crucial factor in enabling the technological development and availability of electronic communications networks. In 2026, HAKOM will start implementing the new Spectrum Management Strategy, which is aligned with the planned network development and growing demand for this resource.

HAKOM has also taken on a new horizontal role as the national coordinator for the implementation of the Digital Services Act, aiming to strengthen the security of the digital space and protect users and platform transparency. In 2026, activities will focus primarily on setting up implementation structures and cooperation mechanisms among all relevant bodies involved in the implementation.

HAKOM's organisational development has become a key prerequisite for it to successfully keep pace with increasingly faster changes and fulfil all of its regulatory competences. Focus has been placed on strengthening employee competencies, adjusting the framework of the process flow, improving internal coordination and knowledge management.



Electronic communications



Electronic communications

The electronic communications market stands at the centre of HAKOM's regulatory activity, as it represents the foundation of the digital transformation and social connectivity. In 2026, HAKOM will act in line with new strategic objectives aimed at stimulating competition and investment, and at users as drivers of the demand for services. The focus will be placed on enabling the development of VHCNs and 5G networks, reducing the digital divide and ensuring the quality and safety of services, while maintaining customer satisfaction.

Of the strategic objectives to be operationalised by this work programme HAKOM underlines user protection and market availability. As one of its priorities, HAKOM will strengthen trust in the market by better informing users about the availability and quality, by transparency and compliance with the set quality standards, while ensuring adequate availability of service. The regulatory measures that HAKOM implements or will adopt have been operationalised in line with the strategic objective of stimulating competition and investments, which prioritises the adoption of transparent and predictable measures that reduce administrative and market barriers to investment and foster competition, as well as the strengthening of security and resilience of electronic communications networks and services. In 2026, HAKOM will carry out a series of concrete activities focused on data collection, analysis and reporting, informing stakeholders about EC networks and services, ensuring preconditions for infrastructure development or improving the regulatory framework. Each of these activities directly contributes to the achievement of strategic priorities in the area of electronic communications and reflects HAKOM's role of a proactive, efficient and professional regulator.

Operational objectives

Strategic objective No. 1: User protection and market availability

HAKOM regularly collects and analyses various indicators of the development of the electronic communications market. HAKOM will continue to publish the information in HAKOM's regular quarterly reports and use it for various internal analyses and decisions pertaining to regulatory obligations. 1

HAKOM will also continue to collect, process and map data on broadband coverage with the aim of identifying areas eligible for state aid co-financing of the construction of electronic communications networks. HAKOM will regularly publish information on the availability and use of broadband speeds, as well as information on the commercial interest in building very high capacity networks through the Geographic Information System (GIS). 2

Pursuant to the Framework National Programme (FNP), the Competent Authority for the Framework Programme (CAFP) is obligated to maintain the FNP website and report on progress and changes in individual projects co-financed under the Operational Programme Competitiveness and Cohesion (OPCC) and the National Recovery and Resilience Plan (NRRP). Good practices and examples will be published on the BCO website, as well as news important for project managers, operators, local self-government units (LAUs) and the public. 3

With the aim of strengthening user awareness and enabling informed and rational decisions 4 regarding the use of electronic communications services, HAKOM plans to improve the existing or develop a new GIS browser for the availability of network infrastructure. The new browser will allow clear and clearly separated displays of data on the coverage and availability of fixed and mobile networks, and will be based on the data HAKOM regularly collects and processes. All publicly available and user relevant data will be included in the browser, with particular emphasis on the transparency, accuracy and up-to-datedness of the information. This will provide users with a better overview of the available internet access speeds at their location, enable them to compare the availability of different technologies and make informed choices when selecting operators. The browser is a valuable tool not only for users, but also for operators and other market stakeholders and will provide for insight into potential investment areas and for the identification of zones with insufficient infrastructure.

Within the framework of its activities as the national BCO, HAKOM expects queries from various 5 stakeholders involved in the development of broadband internet and users/private persons. HAKOM plans to respond to all queries in a timely and informative manner.

HAKOM recognises network neutrality and internet openness as important for market development and for the end-user. It will thus continue to take care of the protection of open internet access and report in line with the EU TSM Regulation. 6

In parallel, HAKOM will monitor and analyse quality parameters for the provision of public voice 7 services by collecting data from operators, while the quality of provided internet access service will be monitored by means of user applications HAKOMetar and HAKOMetar Plus, including checking the parameters of internet openness.

For the purpose of detecting bottlenecks when activating services provided to customers via 8 optical fibre cables, as well as in case of disruptions on optical fibre and copper networks, HAKOM will use the SAT system to collect data for the analysis and identification of key problems in the market and thus accelerate activation and removal of disruptions so as to improve the user experience.

Strategic objective No. 2: Fostering competition and investment

The accessibility of electronic communications services regardless of their geographic location, 9 with guaranteed quality and affordability is ensured through universal services. HAKOM will continue to ensure that universal services are available and of high quality.

For the purpose of full digital inclusion and balanced territorial development, HAKOM will make 10 a detailed analysis of the mapping and cost estimation of full coverage of all addresses not covered with VHCNs. The analysis will provide a clear insight into the remaining white and grey areas and ensure an estimate of the total investments required for full coverage.

The results of this activity will provide a foundation for the development and coordination of further public intervention plans with the MSTI, as well as for communication with the EC. The analysis is particularly important for defining the necessary resources that should be ensured from EU grants.

Fostering VHCN development and investment, especially in rural and underdeveloped areas, 11 is highly dependent on stakeholder awareness and understanding of the importance of broadband networks for future development. As part of the consultation, HAKOM plans to hold workshops, meetings and provide information via other means. Depending on the data available, the needs and interest of stakeholders, the provision of information may be carried out separately with operators and LAUs or jointly, with a view to fostering cooperation and better mutual understanding. Obstacles to investment, possibilities of sharing infrastructure, coordination of investments and possible application for EU financial mechanisms will be discussed with operators. The inclusion of LAUs will focus on their role in spatial planning, permit issuing, local co-financing and, more generally, on strengthening their cooperation with operators. One of the objectives of informing is to increase the use of networks already in place in order to improve readiness at the local level and to coordinate the removal of administrative or technical barriers for use. In doing so, HAKOM aims to ensure the sustainability of existing investments and increase the availability of broadband services to end-users.

Pursuant to the FNP, within the framework of developing internet access financed from EU 12 funds, as the CAFP HAKOM is obligated to notify the EC of the progress of projects co-financed from the OPCC and the NRRP at least once every two years. HAKOM will continue the current practice of annual reporting in 2026 and submit a report for 2025.

At a quarterly level, HAKOM will continue to collect data on the realisation of projects co-financed under the NRRP to continue monitoring and reporting on the C2.3 R4-11 measure. 13

As part of public discussions held when developing the broadband infrastructure development 14 plans for co-financing through EU funds, individual operators expressed commercial interest for construction with regard to certain projects spanning a total of 157,711 addresses. Thus far, more than 90 percent of these addresses were realised, with HAKOM continuing to monitor the realisation of the remaining ones. HAKOM will also monitor the status of remaining unrealised commercial interests, analyse reasons for delay and, where possible, mediate among stakeholders to speed up realisation.

Most expert workshops in which HAKOM participates as a Croatian BCO are organised by the 15 BCO Facility Network and cover a wide range of topics related to the development of digital infrastructure and connectivity in the EU. Participation provides HAKOM with access to information, guidance and good practices from other Member States. In 2026, HAKOM plans to share the knowledge acquired with domestic stakeholders: by producing notes, issuing recommendations and summaries that can also benefit operators, LAUs, contractors and others. By doing so, HAKOM strives to contribute to better planning, implementation and sustainability of digital infrastructure projects in Croatia.

To ensure compliance with regulatory obligations that require the use of the cost of capital in 16 the calculations, HAKOM updates the value of the weighted average cost of capital (WACC) each year. For example, HAKOM uses the WAC in the calculation of cost-oriented prices for wholesale services to enable a return on infrastructure investments. In doing so, HAKOM will also update the additional risk premium when calculating cost-oriented prices provided through VHCNs.

Through analyses of the market for wholesale dedicated capacity and for wholesale trunk segments of leased lines, as part of the regulatory price control and cost accounting obligation, HAKOM has imposed on the SMP operator the obligation to conduct a margin squeeze test (MST) in relation to the prices of the respective retail offers. It has also specified that the method and conditions for conducting the MST for the retail services of dedicated margin capacity will be determined in a separate procedure. In 2026, HAKOM will adopt the Methodology for conducting the margin squeeze test in the dedicated capacity market, and based on this methodology, develop a tool (model) to carry out the MST. 17

With its regulatory measures, which must be proportionate and adjusted to current circumstances and those that can be predicted for the future, HAKOM aims to achieve a level of competition throughout Croatia that will provide end-users with the widest and greatest possible choice. Optical fibre networks are installed by both the incumbent operator and alternative operators. However, it is already certain that no operator will cover all end-users with its own fibre network, and most users will be covered by the fibre network of only one operator. Therefore, in order to maximise the choice of services for end-users, it is necessary to create a regulatory framework in which each operator will be obliged to provide wholesale access to a network or part of a network in situations where it is technically or economically impossible to replicate the network or part of the network to the end-user. In 2026, HAKOM will supplement the existing symmetric regulatory obligations additionally ensuring equal and non-discriminatory access to fibre networks of all operators, so that operators having access can offer their end-users broadband services as the operator owning the optical fibre network. 18

Equal conditions for the provision of retail broadband access services in all areas of the HR are, among other things, ensured through comparable fees for wholesale services in the areas where networks are built commercially and for those that are built through co-financing from EU funds. At the beginning of 2026, based on the data on wholesale charges for access to fibre networks in the areas where electronic communications networks have been built by operators using their own resources without relying on state aid, HAKOM will determine the so-called comparable charges for comparable wholesale services aligning wholesale charges for access to networks built through co-financing. 19

As the VHCN coverage grows, resulting in end-users migrating from the legacy copper infrastructure to newly built VHCNs, HAKOM expects that the copper network will be gradually decommissioned or at least parts of it. Although such plans have not yet been published, HAKOM will prepare guidelines for the time ahead, i.e. its rules of procedure in cases of announced decommissioning of the copper infrastructure. HAKOM will provide support to a rapid migration of users from the copper network to newly built VHCNs, but with mandatory timely, comprehensive and clear provision of information to end-users and operators-users of wholesale services about the process of switching off the copper network and migration to the VHCN. In this context, HAKOM finds it important for end-users and operators-users of wholesale services to receive services of the same or better quality and for customer migration not to undermine the effectiveness of market competition. 20

The current cost-oriented prices of regulated wholesale services were determined in 2024 on the basis of the results of the BU-LRIC+ cost model, which was updated in 2023, and are valid until 2027. Since certain input parameters have changed significantly since then, in 2026 HAKOM will update the BU-LRIC+ cost model with current data in order to be able to set new cost-oriented prices in 2027 in line with the real market situation. 21

Following the update of the BU-LRIC+ cost model, in 2026 HAKOM will launch the process of setting new wholesale charges on M1/2020, M3b/2014, M2/2020 and exM14/2003 markets and wholesale charges for access to cable ducts. The procedure will be completed in 2027, resulting in the determination of monthly and one-off fees. 22

The current version of the ERT model, used for implementing symmetric access obligations, was developed at the end of 2023 and is to the greatest extent based on the results of the adjusted BU-LRIC+ cost model. When upgrading the BU-LRIC+ cost model, HAKOM will also update the adjusted BU-LRIC+ cost model, that is, the ERT model, in order for the implementation of symmetric obligations for access to be adjusted to the current situation in the market. 23

Based on the analyses of the market for wholesale dedicated capacity and wholesale trunk segments of leased lines and within the framework of the regulatory requirement to monitor prices and cost accounting implementation, HAKOM imposed on the SMP operator the obligation to conduct the MST relating to the prices of associated retail offers. It was also determined that the manner and conditions for the implementation of the MST for the retail services of dedicated margin capacity will be laid down in a separate procedure. Until the methodology is adopted and the MST tool is developed tests will be conducted pursuant to the temporary methodology obtained from the analyses. 24

HAKOM regularly collects, analyses and publishes indicators of the development of the electronic communications market. In 2026, HAKOM will start collecting data on indicators of the development of Over-the-Top (OTT) services, which by their characteristics do not belong to the electronic communications market, but have a significant impact on the market. OTT services are provided through various platforms via an internet access service (e.g. WhatsApp, Viber, Facebook, Netflix, etc.). 25

In 2025, HAKOM prepared the methodology for the analysis of retail prices, which is to be implemented as of 2026, when HAKOM starts to collect data on retail tariffs for broadband access services, thus enabling an analysis of price developments. The analyses will also serve to monitor the market and adjust regulatory obligations to current circumstances. 26

Regulatory obligations on markets subject to ex ante regulation are imposed on operators identified as having significant market power (SMP operators). The purpose of imposing regulatory obligations is to remove previously identified barriers to competition. HAKOM will therefore regularly monitor whether they are being implemented as prescribed. 27

It is also important for regulatory obligations to be imposed to remove barriers to competition. However, as time passes and market competition grows, market circumstances change. HAKOM will regularly monitor the situation and, where necessary, adjust these obligations to changes in the market. 28

Symmetric regulatory obligations are imposed on all operators regardless of their SMP status, Currently, the Ordinance on Optical Fibre Distribution Networks (OFDN) lays down the manner in which OFDNs are deployed as a symmetric obligation, which ensures the common use of these networks and the obligation to provide wholesale access to OFDNs. This is aimed at avoiding their multiplication, which is economically unprofitable, physically impracticable or unfeasible, and ensures that all operators not having their own fibre distribution network in an area are able to provide services to end-users through an OFDN. 29

The margin squeeze test (MST) is a regulatory obligation imposed on the SMP operator pursuant to the analyses of the wholesale broadband access market. The obligation ensures that operators which are users of regulated wholesale services from the SMP operator in wholesale broadband access markets can economically replicate retail offers of the SMP operator and stay competitive with their retail offers. 30

The MST model is a tool for performing the margin squeeze test. HAKOM updates the MST model regularly (at least once a year) to ensure that input data are as consistent as possible with the situation in the market. 31

All operators of mobile communications networks that have been granted licences for the use of the RF spectrum at the national level are, when granted the licence, required to grant Mobile Virtual Network Operators (MVNOs) access pursuant to a reasonable request, so that operators who do not own their own mobile communications network can also provide services to end-users. HAKOM will continue to monitor compliance with this obligation. 32

By employing the ERT model for the MVNO access, which was designed in 2025, in case of disputes and ex officio, HAKOM will check whether MVNOs, at the conditions offered by the MNO, can economically replicate its retail services. If it is established that economic replication is impossible, HAKOM will consider that the MNO has failed to comply with the obligation under the licence for the RF spectrum and the MNO will be obligated to offer new wholesale terms and conditions. 33

In case of disputes relating to access based on symmetric obligations for access to optical fibre networks, the ERT model for the implementation of symmetric obligations for access, which was developed in 2023, will be used to check whether operators that are access seekers can, under the conditions offered by the operator that owns the network, economically replicate the retail services of that operator. If it is established that economic replication is impossible, the operator that owns the network will be obligated to offer new wholesale conditions under which such replication will be possible. 34

Networks built with co-financing by state aid from EU funds must be open to all operators under the same conditions, so that all operators can provide services to end-users on equal terms and end-users have the possibility to choose among different operators. For this reason, HAKOM issues opinions on wholesale terms and conditions for access to such networks, which are published in the standard offers of the operators of these networks. 35

In order to facilitate and accelerate the construction of OFDNs, HAKOM will regularly analyse the construction and coverage of OFDNs on a quarterly basis, evaluate progress in the construction of announced OFDNs, check the correctness of construction, identify possible shortcomings and propose improvements. 36

With the aim of undisturbed development and easier obtaining of the necessary permits, i.e. better spatial planning and representation of the ECI in space, HAKOM will hold workshops with the authorities competent for spatial planning, providing an overview of the latest regulations in the field of electronic communications. 37

Throughout the year HAKOM will monitor and analyse key performance indicators (KPI) on the joint use of cable ducts as prescribed by the Standard offer. HAKOM will prepare an internal report based on parameter analysis. 38

To facilitate the construction of the ECI, HAKOM will provide opinions during the process of 39 drafting and adopting spatial plans and public discussions, including the Spatial Development Strategy of the Republic of Croatia, which will ensure the compliance of spatial plans with the legally prescribed criteria for the development of the ECI and associated facilities.

HAKOM will also issue guidelines for spatial planners with the aim of creating spatial plans 40 that comply with the legally prescribed criteria for the development of the ECI and associated facilities.

The Critical Infrastructure Act (CIA) lays down the national framework for the resilience of critical 41 entities, which includes a document on strategic planning for the resilience of critical entities and the national assessment of risks to the critical infrastructure. HAKOM is the competent authority for the categorisation of entities that are the “providers of public electronic communications networks” and “providers of electronic communications services”. The competent authorities in the procedure of determining critical entities carry out sectoral risk analysis, determining the overall impact of disruption to and/or cessation of critical entities, which is carried out in compliance with the cross-sectoral and sectoral risk analysis criteria, employing the established risk analysis methodology laid down in the rules of procedure by the minister.

Pursuant to the Cybersecurity Act (CA), HAKOM is the competent authority for the sector of 42 electronic communications services and networks, while the coordinating body (Mol) in co-operation with competent authorities prepares general, numerical and descriptive indicators of the cross-sectoral risk analysis criteria. By adopting a decision, the minister lays down the cross-sectoral risk analysis criteria for entities in all sectors, while the sectoral risk analysis criteria are laid down by the competent authorities in cooperation with the regulatory authorities and professional associations for each individual sector, taking into account the specifics of each sector.

The CA and the related regulation regulate the system (for 23 sectors) of cybersecurity management that will ensure the effective implementation of procedures and measures for achieving a 43 high level of cybersecurity in the sectors of particular importance for the smooth performance of critical societal and economic activities and the proper functioning of the internal market. HAKOM will by an ordinance lay down procedures and measures specific to the electronic communications sector, which are not covered by horizontal measures of the CA, in particular with regard to the strengthening of the sector's resilience.

The Government of the RH will adopt a medium-term strategic planning act in the area of 44 cybersecurity by 1 February 2027. As the authority competent for the electronic communications sector, HAKOM will participate in the adoption on the new national cybersecurity strategy.

Pursuant to the National Crisis Management Programme, each competent authority must 45 regularly submit reports on the security of the sector under its competence. HAKOM will submit quarterly and annual reports on the security of the ECS/N sector in accordance with the national Security Operating Procedure (SOP).

Pursuant to the CA and the related regulation, as the competent authority HAKOM is obliged 46 to prepare reports and opinions on reports of other sectoral bodies in case of significant incidents.

An internal categorisation of operators in accordance with the CA and ACI has been published 47 thus far. Since certain operators are ceasing or just commencing their operations, it is necessary to timely categorise or decategorise operators. In addition, the existing list of categorised operators needs to be checked on a yearly basis and in case of status changes (e.g. an operator advancing from important entity to a crucial one) a new operator categorisation should be undertaken.

Strategic objective No. 3: Regulatory excellence and compliance

Pursuant to the ECA, operators of public electronic communications networks and publicly 48 available electronic communications services, which are provided on a commercial basis, must notify the Agency in writing, at least fifteen days in advance, about the start, changes to or termination of the provision of electronic communications networks and services. Applications are digitalised through the e-Operator system. HAKOM will respond to all applications and update the EU registry of operators.

An important instrument in regulating the rights arising from the ECA is the right of way. The 49 ECA prescribes that the infrastructure operator is obligated to pay a fee for the right of way to the manager of public property or owner of private property as a regulated right of access, installation, use, repair and maintenance of electronic communications network and the electronic communications infrastructure and associated facilities. HAKOM will continue to regularly address the requests of property owners or managers of the common good and determine infrastructure operators and the amount of fee.

As part of the procedures for determining special terms and condition of connections, HAKOM 50 will inform investors about the position of the ECI for their own protection and notify them of the legal requirements relating to designing the electronic communications infrastructure and electronic communications management.

As part of the procedures of issuing certificates for main projects, HAKOM's objective is to ensure 51 that the protection of the ECI and the ECI design and management in line with regulatory provisions and prescribed standards.

The Central Administrative Database of Ported Numbers (CADPN), as a register important for 52 market competition in the sector of electronic communications must always be available and meet both user and operator needs. HAKOM will ensure the availability of the service throughout the year and examine the need for its upgrading.

HAKOM resolves disputes among two or more operators in connection to obligations arising 53 from the ECA, as well as disputes between operators and other legal persons using access services and/or interconnection services pursuant to the Act.

Strategic objective No. 4: Organisational agility and competence

Indicators of the development of the electronic communications market regularly collected by HAKOM are considered as an important resource and HAKOM strives to make them as available to the general public as possible. In this regard, in addition to regular quarterly reports, HAKOM will provide for dynamic reporting that will allow users to retrieve data in the desired format, consequently ensuring easier processing and use of this data later on. 54

In order to have an open dialogue with stakeholders in the electronic communications market and ensure transparency, exchange of experiences and regulatory predictability, HAKOM will organise an Electronic Communications Market Day conference. 55

The 8th CRO IGF, the national Forum on internet governance will be held in 2026. With HAKOM as the forum initiator and member of the organisation board the forum gathers representatives of the public sector, the academia, the private sector and civil society. The Forum is recognised by the global IGF which operates under the UN mandate. 56

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	1.1	Collecting, processing and publication of EC market indicators	Quarterly reports published	4	Ongoing	Market Economy Department	N
2	1.1	Collecting and processing of data on the broadband access coverage	Graphical display available on the GIS portal	1	Ongoing	Infrastructure Department	N, 3237, 3238
3	1.1	Updating of BCO and CAFP website	Number of updates	12	Ongoing	BCO	N
4	1.1	Developing a GIS browser for availability	% of completion	30%	Q1 2028	BCO	N, 454
5	1.1	Responding to user queries relating to broadband access	% of responses containing requested information	100%	Ongoing	BCO	N
6	1.1	Implementing the rules on network neutrality and preparing reports under the TSM Regulation	Annual report published	1	Ongoing	Communications Services Department	N
7	1.1	Analysis of parameters of the quality of services provided by operators	Semi-annual reports published	2	Ongoing	Communications Services Department	N
8	1.1	Collecting and processing of data on the activation of services on optical fibre cables and removal of disruptions for end-users to detect bottlenecks	Data is collected in the SAT system	1	Ongoing	Infrastructure Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
9	1.2	Supervising the quality of universal service provision in electronic communications	Annual report on universal service quality published	1	Ongoing	Communications Services Department	N
10	2.1	Mapping and cost analysis of full VHCN coverage of the HR	% of completion	100%	Q2 2026	BCO	N, 3237
11	2.1	Advising stakeholders / workshops/meetings/ other forms of providing information	Number of meetings per year	≥ 3	Q4 2028	BCO	N
12	2.1	Preparing the 2025 Annual report on broadband network development in the HR	2025 Annual report on broadband network development submitted/ published	1	Q1	BCO	N
13	2.1	Progress report on C2.3 R4-11 measure implementation under the NRRP	Internal report	4	Ongoing	BCO	N
14	2.1	Monitoring the realisation of the commercial interests of operators	Internal report	4	Ongoing	BCO	N
15	2.1	Participating in EU expert workshops on digital infrastructure development and connectivity	Number of notes/recommendations	4	Ongoing	BCO	N
16	2.1	Updating of WACC values and additional risk premium for VHCNs	Decision published	Yes	Q4 2026	Market Economy Department	N
17	2.1	Methodology and the model for MST implementation in the market of dedicated capacity services	Methodology published and MST model developed	Yes	Q4 2026	Market Economy Department	N, 3237
18	2.1	Supplementing of the symmetric regulatory obligation	Amended ordinance published in OG	1	Q3 2026	Market Economy Department	N
19	2.1	Determining benchmark fees as the basis for access to networks developed with grants from EU funds	Decision published	1	Q1 2026	Market Economy Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
20	2.1	Preparing the guidelines (rules) for HAKOM's procedure for announcing the decommissioning of the copper network	Guidelines published	1	Q3 2026	Market Economy Department	N
21	2.1	Updating of the BU-LRIC+ cost model with current data	Updated BU-LRIC+ cost model	1	Q3 2026	Market Economy Department	N, 3237
22	2.1	Determining regulated wholesale prices	% of completion of the decision	30%	Q3 2026	Market Economy Department	N, 3237
23	2.1	Updating the ERT model for implementing symmetrical access obligations with current data	ERT model updated	1	Q3 2026	Market Economy Department	N, 3237
24	2.1	Implementing of Margin Squeeze Test (MST)	% of offers tested	33%	Ongoing	Market Economy Department	N
25	2.1	Collecting, processing and publication of the indicators on development of OTT services	Quarterly reports published	4	Ongoing	Market Economy Department	N
26	2.1	Collecting and analysing data on retail prices in the electronic communications market	Quarterly reports published	4	Ongoing	Market Economy Department	N
27	2.1	Monitoring of the implementation of regulatory obligations on regulated markets	Internal report	1	Q4 2026	Market Economy Department	N
28	2.1	Monitoring of the situation in the electronic communications market and analysing the need to adjust regulatory measures to the situation in the market	Internal report	1	Q4 2026	Market Economy Department	N
29	2.1	Monitoring of the implementation of symmetric regulatory obligations	Internal report	1	Q4 2026	Market Economy Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
30	2.1	Conducting MS tests of retail offers in the broadband access services market	% of offers tested in <= 20 days	100%	Ongoing	Market Economy Department	N
31	2.1	Updating of the MST model with current data	Updated MST model	1	Ongoing	Market Economy Department	N
32	2.1	Monitoring of the implementation of obligations for the MVNO access	Internal report	1	Q4 2026	Market Economy Department	N
33	2.1	Verifying the conditions for the MVNO access through the implementation of the ERT model	Number of published verifications	3	Ongoing	Market Economy Department	N
34	2.1	Verifying the implementation of symmetric obligations through the implementation of the ERT model	Number of published verifications	3	Ongoing	Market Economy Department	N
35	2.1	Issuing an opinion on wholesale conditions of network access to networks the construction of which is co-financed from EU funds	Number of opinions	9	Ongoing	Market Economy Department	N
36	2.1	Supervision of SDM network construction for early identification of shortcomings	Internal quarterly report	4	Ongoing	Infrastructure Department	N
37	2.1	Holding spatial planning workshops	Number of workshops per year	2	Q4 2026	Infrastructure Department	N
38	2.1	Analysis of regulated KPIs on the joint use of cable ducts	Internal report	2	Ongoing	Infrastructure Department	N
39	2.1	Issuing an opinion in the procedure of adopting spatial plans and public discussions, including the Spatial Development Strategy of the Republic of Croatia	% of opinions given in within the statutory time limit	100%	Ongoing	Infrastructure Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
40	2.1	Issuing requirements (guidelines) to be observed when developing spatial plans at all levels	% of guidelines issued within the statutory time limit	100%	Ongoing	Infrastructure Department	N
41	2.3	Identifying critical entities and national assessment of risks to critical infrastructure for the electronic communications sector	Completed National risk assessment of the ECS/N sector and a list of critical entities	1	Q2 2026	Communications Services Department	N, 3237
42	2.3	Developing sectoral measures for risk analysis pursuant to the Critical Infrastructure Act	Sectoral measures developed	1	Q1 2026	Communications Services Department	N, 3237
43	2.3	Preparing the ordinance prescribing sector specific requirements relating to the security of electronic communications networks and services	Ordinance published in the OG	1	Q2 2026	Communications Services Department	N
44	2.3	Preparing the document on strategic planning in the area of cybersecurity	National document on strategic planning in the area of cybersecurity	1	Q1 2027	Communications Services Department	N
45	2.3	Analysing the security of networks and services and preparing a report in line with SOP	Quarterly reports; Annual report submitted/published	4;1	Ongoing	Communications Services Department	N
46	2.3	Processing of reported security incidents and preparation of reports	% of incidents for which reports were prepared	100%	Ongoing	Communications Services Department	N
47	2.3	Operator categorisation in line with the CA and CIA	List of categorised operators published	1	Ongoing	Communications Services Department	N, 3237
48	3.1	Dealing with registration applications and notifications on the commencement or termination of provision of electronic communication services	HAKOM's certificates issued within the time limit <= 6 days; EU registry of operators updated with Croatian operators	90%; 1	Ongoing	Communications Services Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
49	3.1	Determining the infrastructure operator (right of way)	% of resolved requests	100%	Ongoing	Infrastructure Department	N
50	3.1	Determining special terms and conditions / connection terms and conditions	Number of determined special terms and conditions / connection terms and conditions	100%	Ongoing	Infrastructure Department	N
51	3.1	Issuing certificates for the main project	Number of certificates for the main project	100%	Ongoing	Infrastructure Department	N
52	3.2	Enabling the service of number porting	Availability >99% of time	1	Ongoing	Communications Services Department	N
53	3.2	Resolving of regulatory disputes among operators of electronic communications	Number of procedures	5	Ongoing	Legal Affairs Department	N
54	4.2	Enabling dynamic reporting on electronic communications market indicators on HAKOM'S website	Dynamic reports on the website	1	Q2 2026	Market Economy Department	N
55	4.2	Organising the Electronic Communications Market Day conference	Conference held	1	Q3 2026.	Electronic Communications Sector	N, 3235a
56	4.2	Supporting the national Forum on internet governance (CRO-IGF	Forum held	1	Q3 2026	Policy Implementation and Management Support Office	N, 3235



Postal services



Postal services

The postal services market in the Republic of Croatia has been faced with a long term trend of declining volumes of traditional mail and a parallel growth in demand for package delivery services spurred by the development of e-commerce. HAKOM's Strategy for the period 2026-2028 recognises the need to adapt the regulatory approach to new market realities, with a focus on the sustainability of universal service, the protection of users and the promotion of competition. HAKOM will endeavour to improve the availability of services and ensure the same standard of service to all users.

In meeting its strategic objectives in 2026, HAKOM's priorities in the market remain customer protection and market availability, especially with a view to ensuring the required quality of postal services. A transparent and predictable regulatory approach will contribute to the achievement of the strategic objective of stimulating market competition and investments in the postal services market. Regulatory compliance, i.e. the effective surveillance of this market, imposed itself as an important priority in 2026.

Operational objectives

Strategic objective No. 1: User protection and market availability

HAKOM continuously collects and analyses the indicators of the development of the postal services market and will continue to publish them on a regular quarterly basis. The collected data will also be used for the regular activities or reporting to various bodies or institutions. 1

As part of the regulatory obligations arising from the Regulation on cross-border parcel delivery services, HAKOM collects statistical and financial data on cross-border parcel traffic and submits them to the EC. In accordance with the provisions of Article 6 of the Regulation, HAKOM will also carry out an evaluation of cross-border tariffs charged per parcel. 2

After obtaining the Report on the quality of the provision of the universal service by the universal service provider, HAKOM will carry out an audit through an independent body to verify the report, in particular as regards the quality of parcel delivery. In accordance with the results of the audit, if the quality does not meet the prescribed criteria, HAKOM will undertake corrective measures. 3

In order to ensure the availability of the universal service at affordable and cost-oriented prices, HAKOM will carry out a control and calculation of the price limit of the universal service in accordance with the adopted Methodology, which allows HAKOM to assess the compliance of the proposed prices with the principles laid down in Articles 45 and 46 the PSA. 4

HAKOM will continuously control the prices of universal service and the application of prices in contracts concluded by the universal service provider with large users. 5

An independent auditor will audit the Regulatory Financial Statement (RFS) of the universal service provider, which the provider is required to prepare in accordance with the methodology prescribed by the HAKOM's Instructions. The verification of accuracy will be followed by a statement of (Non) Compliance with the Methodology. 6

The universal service provider has the right to reimbursement of the net cost when the obligation to provide the universal service constitutes an unfair financial burden on the provider. HAKOM then checks the basis for the net cost calculation. After checking the merits of the claim, HAKOM determines the amount of the net cost that is to be paid to the universal service provider from the state budget. 7

HAKOM will continuously monitor compliance with the prescribed criteria related to the density of universal service providers' access points, and will pay special attention to compliance with the prescribed procedure when closing or relocating/reconstructing post offices. 8

HAKOM will simultaneously control the operation and the working hours of post offices and their compliance with the set criteria. 9

Strateški cilj 2.: Poticanje tržišnog natjecanja i ulaganja

Throughout the year, HAKOM will monitor the determination and application of prices, conditions and obligations related to network access in order to ensure a level playing field and market competition. Where necessary, HAKOM will take regulatory measures and resolve disputes over network access should they arise. 10

In view of the expansion of e-commerce and the inclusion of online platforms and e-retailers that perform (or organise) delivery in the so-called last mile segment, HAKOM will focus on the analysis of new business models and their impact on traditional service providers and market competition, and on the applicability of the existing regulatory framework. 11

Strategic objective No. 3: Regulatory excellence and compliance

HAKOM continuously keeps a register of postal service providers containing the data prescribed under Article 8, paragraph (4) of the Postal Services Act and will regularly update it throughout the year. 12

During the year, HAKOM will check the compliance of identified deviations in the provision of the universal service with the provisions of the Ordinance on the provision of universal service, especially in the part of the requirement of five-day delivery. 13

HAKOM will control the prices of interchangeable postal services and determine their compliance with the provisions of the Postal Services Act. As part of the control, HAKOM will also check the application of these prices in contracts concluded by the universal service provider with large users. 14

HAKOM will continue to check the compliance of submitted applications, supplemented applications, and of amendments to the general terms and conditions and the price list of postal services of existing providers, and where necessary, order amendments in case they do not comply with the Postal Services Act. 15

HAKOM will follow the procedure related to the settlement of disputes between the universal service provider and access users in connection with the provision of network access and disputes among postal services providers. 16

Strategic objective No. 4: Organisational agility and competence

Aiming to ensure an open dialogue with stakeholders in the postal services market, transparency, exchange of experiences and regulatory predictability, HAKOM will organise a Postal Services Market Day conference. 17

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	1.1	Collection and publication of indicators for the postal services market	Quarterly reports published	4	Ongoing	Postal Services Sector	N
2	1.1	Submitting data to the EC in accordance with the Regulation on cross-border parcel delivery services	Number of data submissions	3	Q1, Q2 and Q3 2026	Postal Services Sector	N
3	1.1	Checking the quality of the universal service provision	Internal audit report	1	Q3 2026	Postal Services Sector	N
4	1.2	Controlling and calculating the price cap on the universal service in accordance with HAKOM's Methodology for the regulation of prices of the universal service	Internal report	1	Q4	Postal Services Sector	N, 3237
5	1.2	Controlling the prices and discounts for the universal postal service	Internal semi-annual report	2	Q2 and Q4 2026	Postal Services Sector	N
6	1.2	Audit of the Regulatory Financial Statement (RFS) and compliance of accounting separation	Statement of (Non) Compliance published	1	Q3 2026	Postal Services Sector	N, 3237a
7	1.2	Checking the unfair financial burden on the provider of the universal service and calculating the remuneration (net cost)	Decision published	1	Q4 2026	Postal Services Sector	N, 3237

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
8	1.2	Controlling the fulfilment of conditions of the postal network of the universal service provider	Number of permanent postal offices	>=700	Ongoing	Postal Services Sector	N
9	1.2	Controlling the operation and working hours of postal offices	Internal report	1	Ongoing	Postal Services Sector	N
10	2.1	Controlling the terms and conditions, and prices for access to the postal network of the universal service provider	Number of controls	1	2026	Postal Services Sector	N
11	2.1	Analysing the influence of e-commerce, online platforms and digitalisation on the postal services market and emergence of new ways of postal services provision	Analysis completed	1	Ongoing	Postal Services Sector	N, 3237a
12	3.1	Maintaining a registry of postal services providers	Updated registry	1	Ongoing	Postal Services Sector	N
13	3.2	Controlling divergences from the provision of the universal service	Number of controls	3	Ongoing	Postal Services Sector	N
14	3.2	Controlling prices and discounts for interchangeable postal services	Internal semi-annual report	2	Q2 and Q4 2026	Postal Services Sector	N
15	3.2	Controlling the compliance of the postal services provider with requirements	Number of controls	10	Ongoing	Postal Services Sector	N
16	3.2	Resolving regulatory disputes between access providers and access users	Number of decisions	1	Ongoing	Postal Services Sector	N
17	4.2	Organising the Postal Services Market Day conference with stakeholders in the postal services market	Conference held	1	Q4 2026	Postal Services Sector	N, 3235



Rail services

Rail services

The regulatory role in the field of rail services is directed at ensuring lawful, transparent and non-discriminatory access to the rail infrastructure and at the improvement of market competitiveness and interoperability, as well as at the protection of passenger rights. In 2026, activities will continue in relation to the regulatory framework of the rail services market, the supervision of access to the infrastructure, the implementation of regulatory obligations towards the infrastructure manager and undertakings and to the development of instruments for collecting and analysing market data. Some of the focus will continue to be on strengthening institutional capacity and cooperation with domestic and European stakeholders aiming at a harmonised implementation of regulations and sector development.

The main focus in 2026 will be on the protection of passengers and on ensuring the availability and accessibility of services, including the protection of passengers with reduced mobility and persons with disabilities travelling by train. It will be equally important to ensure a level playing field for all market players, to encourage competition and promote, i.e. strengthen, the competitiveness of rail transport.

Operational objectives

Strategic objective No. 1: User protection and market availability

HAKOM continuously collects and analyses various indicators of the development of the rail services market and will continue to publish them on a regular quarterly basis. HAKOM will use the collected data for regular activities, decision-making and reporting to other bodies or institutions. 1

For the purpose of information availability and transparency in the rail services market, HAKOM will continue to keep a regularly updated register of the rail services provided by service facilities operators and publish the data on its website. 2

Once every two years, HAKOM conducts consultations with end-users of services, evaluating the quality of rail freight transport and market relations. HAKOM will publish the results of the consultations and the conclusions will serve as guidance for further regulatory action. 3

Once every two years, HAKOM conducts consultations with end-users of services, evaluating the quality of rail passenger transport and market relations. HAKOM will publish the results of the consultations and the conclusions will serve as guidance for further regulatory action. 4

Strategic objective No. 2: Fostering competition and investment

As a regulatory body, HAKOM is responsible for verifying the implementation of the obligations of the infrastructure manager and of the passenger and freight undertakings in relation to compliance with accounting separation provisions, as well as for auditing the obligations of service facility operators. HAKOM will collect the necessary data and analyse them. 5

Following a mandatory procedure with market stakeholders, the infrastructure manager submits its draft business plan to HAKOM for a non-binding opinion. HAKOM will analyse the plan and issue an opinion, especially regarding the parts pertaining to system improvements. 6

Strategic objective No. 3: Regulatory excellence and compliance

The measures under the Commission Implementing Regulation [\(EU\) 2015/1100](#) and the Railway Act require that HAKOM monitors the state of the rail services market and provide the EC with the collected indicators and any clarifications on the state of the rail services market. HAKOM will also provide data collected from stakeholders to the MSTI. 7

HAKOM continuously monitors the development, adoption, amendments, implementation and application of the conditions and criteria contained in the Network Statement as a key document when it comes to terms and conditions and access to the rail infrastructure and service facilities. This will again in 2026 allow HAKOM an oversight of the situation and quick reaction if needed. 8

Based on the analysis of regulations, strategic public documents, decisions by the courts and the EC, HAKOM will analyse the situation in the rail services market of the HR and initiate appropriate procedures, i.e. adopt decisions for return to compliance with the regulatory framework. 9

Service facilities are of utmost importance for the rail services market, its development and the increase in the number of undertakings. HAKOM will therefore regularly check whether a level playing field, non-discriminatory access and transparency in the provision of services are ensured in accordance with the Commission Implementing Regulation [\(EU\) 2017/2177](#). 10

Where necessary, HAKOM, as the competent authority, will resolve disputes between rail service providers and users. 11

Strategic objective No. 4: Organisational agility and competence

HAKOM will actively participate in conferences, professional and scientific gatherings and forums and among stakeholders promote market development and protection of stakeholders' rights. Through education such as organised workshops, HAKOM will familiarise service facilities operators and new market players with new tools for the surveillance of the situation in the market and the best EU regulatory practice. 12

To foster an open dialogue with rail market stakeholders, transparency, exchange of experiences and regulatory predictability, HAKOM will organise a Rail Services Market Day conference. 13

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	1.1	Collection and publication of indicators for the rail services market	Quarterly report	4	Ongoing	Railway Services Sector	N
2	1.1	Maintaining a register of the rail services of service facilities operators	Updated and available register >= 99% time	1	Ongoing	Railway Services Sector	N
3	1.1	Consultations with users of rail freight transport services	Report published	1	Q12027	Railway Services Sector	N
4	1.1	Consultations with users of rail passenger transport services	Report published	1	Q12027	Railway Services Sector	N
5	2.1	Analysing regulatory financial statements of undertakings and the infrastructure manager	Internal analysis	1	Q3	Railway Services Sector	N
6	2.1	Issuing an opinion on the business plan of the infrastructure manager	Opinion issued to the infrastructure manager	1	Q12026	Railway Services Sector	N
7	3.1	Reporting to the EC and the MSTI on the supervision of the rail market	Report submitted to the EC	1	Q42026	Railway Services Sector	N
8	3.2	Supervising the implementation of the Network Statement and its amendments	Internal report	1	Ongoing	Railway Services Sector	N
9	3.2	Controlling the rail services market and harmonisation with the regulatory framework	Internal report	1	Ongoing	Railway Services Sector	N
10	3.2	Controlling the compliance of service facilities	Number of controls	5	Ongoing	Railway Services Sector	N
11	3.2	Resolving regulatory disputes in the rail market	Number of decisions	1	Ongoing	Railway Services Sector	N
12	4.2	Educating stakeholders	Number of training opportunities	2	Ongoing	Railway Services Sector	N
13	4.2	Organising the Rail Services Market Day conference	Conference held	1	Ongoing	Railway Services Sector	N, 3235



User protection



User protection

A satisfied customer or traveller, who trusts the market and service providers, is essential for market growth, its development and adjustment to future needs. One way to gain user trust is to provide for quick and easy resolution of possible problems with the service at no additional cost, as well as to make the offer for contracted service transparent and easily understandable, without unnecessary small print, and for services to always meet the prescribed quality standards. Accessibility of service is also important to today's users, i.e. removing barriers for the use of the service, which often makes universal design a solution to this challenge. These basic principles of user and passenger protection will continue to guide HAKOM's activities in 2026.

The most important operational objectives in 2026 include the regular publication of information on service quality and conditions, user education and the establishment of complaint-handling mechanisms. In line with HAKOM's strategic determinants, some of the objectives are directed at accessibility and the needs of vulnerable user groups.

Operational objectives

Strategic objective No 1:User protection and market availability

End-users have the possibility to contact HAKOM via phone and other channels (via mail, e-mail, 1 various applications and social media) with their queries and various submissions. HAKOM will respond to all queries/submissions within the specified deadlines.

Within the scope of its competences, HAKOM will continue to provide informational answers 2 to queries and submissions of users and other postal market stakeholders and provide explanations regarding the application of the PSA and the regulations adopted pursuant to it.

HAKOM will continue to respond informatively and quickly to queries and submissions from 3 passengers/users on the application of regulations governing the rail services market and on the protection of the rights of passengers in rail passenger transport.

In accordance with the ECA, after having completed the two-instance complaint procedure 4 with the operator, the user can submit a request for resolution of the dispute to HAKOM, which makes the final decision following the opinion of the Commission for the Protection of Users' Rights, comprised of the representatives of consumer protection associations. The latest amendments to the Act shortened the deadline for resolution from four to two months. HAKOM will resolve more than 95% of disputes within the set deadline.

In accordance with the PSA, after having completed the two-instance complaint procedure with 5 the service provider, the user can submit a request for the resolution of the dispute to HAKOM, which makes the final decision following the opinion of the Commission for the Protection of Users' Rights, comprised of the representatives of consumer protection associations. HAKOM will resolve all cases within the legal deadline of four months.

The latest amendments to the ARRSM changed the procedure for passengers' objections to 6 the service by allowing passengers to submit a request for resolution of the dispute to HAKOM after the first instance. HAKOM then issues a decision based on the opinion of the Commission. HAKOM will resolve all disputes within the legal deadline of three months.

In cooperation with consumer protection associations, HAKOM regularly holds workshops for 7 end-users and passengers, informing them about the rights related to the use of electronic communications and postal services and rail travel.

Guided by the policy that an "informed user is the best protected user", HAKOM plans to prepare 8 leaflets, brochures, videos and use social networks and media presence to reach various age groups of end-users and familiarise them with their rights related to the use of electronic communication, postal and rail services.

In cooperation with schools and associations, HAKOM regularly holds workshops for minors 9 informing them of their rights when using electronic communication services. HAKOM will try to respond to all requests to hold workshops.

Through regular control of the methods of selling electronic communications services, HAKOM 10 aims to ensure that these are contracted transparently with the ultimate objective of strengthening the trust of end-users in the market and them being better informed when contracting these services. As a result of such approach, HAKOM expects a smaller number of complaints and, consequently, of disputes.

By regularly checking the work of operators' services, HAKOM intends to reduce the duration 11 of complaint/objection procedures with operators, i.e. aims to achieve a high proportion of correctly resolved complaints in the first instance, which is expected to affect the ultimate number of disputes.

Every six months HAKOM publishes a report on disputes brought before it, and on complaints 12 and objections submitted to operators. This report, which includes the analysis of resolved disputes, focuses primarily on operators and its aim is to improve their practices when dealing with complaints and objections (recourse) in the first and the second instance.

Operators are obliged to submit changes to their price lists eight days before publication. By 13 regularly monitoring price lists HAKOM will ensure their transparency and compliance with regulations.

The Do Not Call Register enables users to enter their telephone number in the register and 14 thus prohibit merchants from contacting them for advertising and sales purposes. HAKOM will continue to cooperate with the Ministry of Economy and maintain the register.

To monitor customer satisfaction with postal services and prices, deadlines and the quality of 15 service, HAKOM will conduct an analysis and publish the results.

Aiming to increase accessibility and spread knowledge and awareness of accessibility, HAKOM 16 will carry out a project in cooperation with the Faculty of Electrical Engineering and Computing in the course of the year, which will include interested cooperative associations of persons with disabilities. The project seeks to find and test solutions to previously identified challenges in the area of accessibility and inclusion.

Strategic objective No 3: Regulatory excellence and compliance

In order to protect the rights of passengers, which includes special protection of the rights of persons with disabilities and reduced mobility, HAKOM will continuously monitor whether their rights are protected. Inspections will be carried out according to the inspection plan, at the request of passengers or on the basis of other available information. 17

HAKOM regularly checks whether operators' general and specific terms and conditions comply with the obligations and regulations. 18

Strategic objective No- 4: Organisational agility and competence

By cooperating with the academic community and by holding annual conferences for people with disabilities, HAKOM raises awareness of the rights of persons with disabilities, and through open dialogue seeks solutions to identified challenges, as well as exchanges experiences with all interested parties. The conference will traditionally be held in the second quarter of the year. 19

In cooperation with interested associations and organizations, HAKOM will organise the Safer Internet Day, which is celebrated internationally on the second Tuesday in February. 20

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	1.1	Responding to queries and submissions of electronic communications users	% answered queries/re-solved submissions within prescribed deadlines	100%	Ongoing	Consumer Protection Department	N
2	1.1	Responding to queries and submissions of users and other stakeholders in the postal services market	Number of queries/submissions	300	Ongoing	Postal Services Sector	N
3	1.1	Responding to queries and submissions of users and other stakeholders in the rail services market	Number of queries/submissions	50	Ongoing	Railway Services Sector	N
4	1.1	Resolving user disputes in the electronic communications market	% of resolved disputes within the prescribed deadline	>=95%	Ongoing	Consumer Protection Department	N
5	1.1	Resolving user disputes in the postal services market	% of resolved disputes within the prescribed deadline	100%	Ongoing	Postal Services Sector	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
6	1.1	Resolving user disputes in passenger rail transport	% of resolved disputes within the prescribed deadline	100%	Ongoing	Railway Services Sector	N
7	1.1	Holding workshops for end-users in cooperation with consumer protection associations (rights when using EC services, postal services and rail services)	Number of workshops	12	Ongoing	Consumer Protection Department, Postal Services Sector, Railway Services Sector	N, 3233
8	1.1	Informing and educating users by preparing educational materials (leaflets, brochures, videos) and via social media	Materials prepared	1	Ongoing	Consumer Protection Department, Postal Services Sector, Railway Services Sector	N, 3233,
9	1.1	Holding workshops for vulnerable user groups relating to safety online	Number of workshops	8	Ongoing	Consumer Protection Department	N
10	1.1	Checking the transparency of contracting electronic communication services	Number of conducted controls	6	Ongoing	Consumer Protection Department	N
11	1.1	Preventive checks of the work of operators' services in the first and the second instance	Number of conducted controls	6	Ongoing	Consumer Protection Department	N
12	1.1	Collecting, processing and publication of data on objections and disputes	Semi-annual and annual report published	2	Ongoing	Consumer Protection Department	N
13	1.1	Monitoring of received amendments to operators' price lists and checking compliance with regulations on transparency and non-discrimination of users	Internal report	1	Ongoing	Consumer Protection Department	N
14	1.1	Maintaining the Do Not Call register and cooperation with the Ministry of Economy	Availability > 99% time	1	Ongoing	Consumer Protection Department	N, 3238, 454

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
15	1.1	Survey of satisfaction and needs of users of postal services	Report published	1	Q3 2026	Postal Services Sector	N, 3237
16	1.2	Implementation of the Accessibility project in cooperation with the Faculty of Electrical Engineering and Computing and persons with disabilities	Project report	1	Q4 2026	Policy Implementation and Management Support Office	N
17	3.2	Inspection supervision in the field protection of passenger rights in rail transport	Number of inspections	6	Ongoing	Railway Services Sector	N
18	3.2	Checking operators' general and specific terms and conditions	Internal report	100%	Ongoing	Consumer Protection Department	N
19	4.2	Enhancing accessibility for persons with disabilities and organising the Accessible Future Conference	Conference held	1	Q2 2026	Consumer Protection Department	N, 3233, 3235, 3237
20	4.2	Raising awareness of safety online and jointly organising the Safer Internet Day conference	Conference held	1	Q1 2026	Consumer Protection Department	N, 3235



Management of limited resources

Management of limited resources

The management of limited resources, such as the radiofrequency spectrum and the addressing and numbering space in electronic communications is one of the fundamental regulatory tasks of HAKOM. These resources are technically, geographically and quantitatively limited, while at the same time being essential for the development of electronic communications, digital services and related technologies. In the field of the radiofrequency spectrum, HAKOM will act in accordance with national and European plans for spectrum use and allocation, taking into account technological neutrality, the efficiency of spectrum use and availability for different users – from public communications networks to specific purposes, such as security, defence or science. In the area of numbering and addressing, HAKOM will ensure the stability and transparency of the system, monitor market needs and carry out the necessary allocations or revoke numbering resources.

Among the strategic objectives and priorities that are operationalised in 2026, transparency related to the different aspects of radiocommunication services and the availability of services are highlighted, with increasing requirements for the security of service provision, but the focus remains strongly maintained on the efficient spectrum management as the basis for radiocommunication services.

Operational objectives

Strategic objective 1: User protection and market availability

Protection from electromagnetic fields (EMFs) of radio stations in the areas of increased sensitivity 1 aims at controlling the levels of EMFs generated by radio stations and, where appropriate, includes preventive or corrective measures and ensures compliance of the installation of radio stations with regulations, which regulate electronic communications. This also ensures compliance with health regulations on protection from EMFs. Throughout the year, HAKOM will regularly check base stations and carry out measurements on the ground if necessary. Control measurements of the EMF levels of base stations and other radio stations will be published on the GIS portal.

In order to protect users and control the levels of EMFs caused by radiocommunication systems, 2 HAKOM will regularly control the calculations and issue certificates of compliance with limit values for EMF levels for base stations in mobile communications networks and for radio stations in broadcasting (DAB and DVB-T2), while other service certificates will be entered in individual licences for the RF spectrum use. The certificates will continue to be based on the calculation and/or measurement of the EMF levels defined in the Ordinance on protection from electromagnetic fields (OG 146/2014 and 31/2019).

Within the framework of meeting transparency obligations under the TSM Regulation in relation 3 to the speed of internet access in mobile telecommunications networks, a measuring operation will be carried out aimed at verifying data on the coverage of mobile networks supplied by mobile telecommunications network operators. In addition to verifying network coverage, a detailed measurement of the operators' key performance indicators will be carried out. The operation will be carried out on an ongoing basis in order to regularly refresh data processed as part of the comparison of submitted coverage maps. The data provided by operators as part of comparable coverage maps as well as data on the quality of data and voice services will be published on the website.

Strategic objective 2: Fostering competition and investment

The publishing of data on the geographical coverage of mobile communications networks with the calculated values of signal levels in space is intended for end-users with the aim of transparency and informing on the availability and coverage of networks in specific areas. HAKOM will update the data regularly to keep the presentation current. 4

HAKOM has been entrusted with the task of managing the addressing and numbering space in electronic communications and the effective management is a prerequisite for market competition. This includes monitoring market situation, timely drafting of the Addressing Plan and the Numbering Plan, timely assignment of addresses and numbers and the adoption of the necessary regulations that enable users the portability and use of the numbering and addressing space. The received requests for the assignment/revocation or transfer will mostly be dealt with within two thirds of the legal deadline. 5

HAKOM regularly carries out the activities of planning and optimisation of broadcasting networks, as well as other radiocommunication networks, such as private mobile networks and microwave links. In 2026, HAKOM will continue optimising and planning to improve the coverage of existing networks and ensure conditions for the operation of new networks. 6

International harmonisation of radiocommunication systems in neighbouring countries is often the easiest to implement as part of an agreed cooperation based on bilateral or multilateral technical and implementing agreements. Therefore, the signing and implementation of agreements with countries in Croatia's near neighbourhood is an important and regular activity HAKOM will continue to implement. 7

The RF spectrum allocation table is a key MSTI document defining the distribution of the frequency bands. To amend this document, HAKOM will prepare and propose amendments based on market requirements, technological needs and international commitments. 8

The RF spectrum management includes ensuring smooth use at the national and international levels. For this reason, HAKOM continuously controls the radiofrequency spectrum to determine the existence of interferences and in case of detection, takes the prescribed measures to eliminate them. In cases where interferences are caused by electronic communications networks, radio stations, radio systems or other radio equipment from other countries, HAKOM cooperates with the competent authorities of those countries in accordance with the relevant regulations and recommendations of the International Telecommunication Union (ITU), the European Conference of Postal and Telecommunications Administrations (CEPT) and the European Union. Any detected and measured international interferences will be reported according to international procedures. 9

In cases where interference with radiocommunication systems originating from Croatia is detected, HAKOM will remove it in accordance with the legally prescribed procedure. 10

From July to September each year extensive measurements are performed to protect Croatian radio (FM and T-DAB+) and television (DVB-T/T2) networks from interference originating from the Italian Republic to VHF and UHF frequency ranges. After the measurement, the measurement results will be processed and detected interferences will be reported to the Italian administration and the International Telecommunication Union (ITU). 11

Individual licences for the radiofrequency spectrum use are issued based on the applications: for stations in amateur service (AR), on a vessel (PL), on an aircraft (ZR), for fixed radio stations (NP), mobile radio stations (PK), microwave links (MV), stations in satellite service (SA), in broadcasting (RT) and temporary licences for sporting or cultural events and technical checks. The vast majority of licences will be issued within the deadlines shorter than prescribed. 12

Fees are paid for spectrum use, and HAKOM prepares fee calculations and issues annual invoices to operators and other users with valid licences. HAKOM will continue to manage the spectrum up to date and issue invoices at least 30 days before the calculation period. 13

Within defined international deadlines and according to ITU rules, HAKOM will solve all international requests for the harmonisation of technical parameters of radiocommunication networks, such as broadcasting or satellite. 14

As part of international activities, HAKOM plans to provide new frequency resources for the DAB+ broadcasting systems with the aim to ensure efficient future use of the VHF III frequency band without interference from neighbouring countries. 15

In order to ensure the effective and efficient operation of meteorological radars, which operate within the 5470-5725 MHz frequency band (in the following order: RC Gradište kod Županje, RC Bi-logora, RC Debeljak – Sukošan, RC Goli, RC Ulijenje and RC Puntijarka) and share it with WAS/RLAN devices, HAKOM plans a targeted check of the use of the 5 GHz frequency band, the compliance of the operation of WAS/RLAN devices with the provisions laid down in the general licence and the removal of unwanted interference with meteorological radars. Given the confirmed importance of the database of reported WAS/RLAN radio stations for efficient spectrum management and interference removal, HAKOM will continue to improve the application for reporting devices. 16

HAKOM's control and measuring system is of particular interest to the Republic of Croatia because it is part of the national critical infrastructure and the national security system. Therefore, it has to be regularly inspected, maintained and its continued operational readiness has to be ensured. It is also necessary to continuously invest in its development and upgrading so that the system can be up to date with the rapid technological progress of wireless communications and meet increasing safety requirements amid growing threats. The entire system and measuring equipment will be regularly maintained. 17

Strategic objective 3: Regulatory excellence and compliance

The adjustment of national regulations to EU regulations, which aim to align and harmonise the use of RF spectrum within all EU Member States, has become HAKOM's regular activity and continued objective. 18

Strategic objective 4: Organisational agility and competence

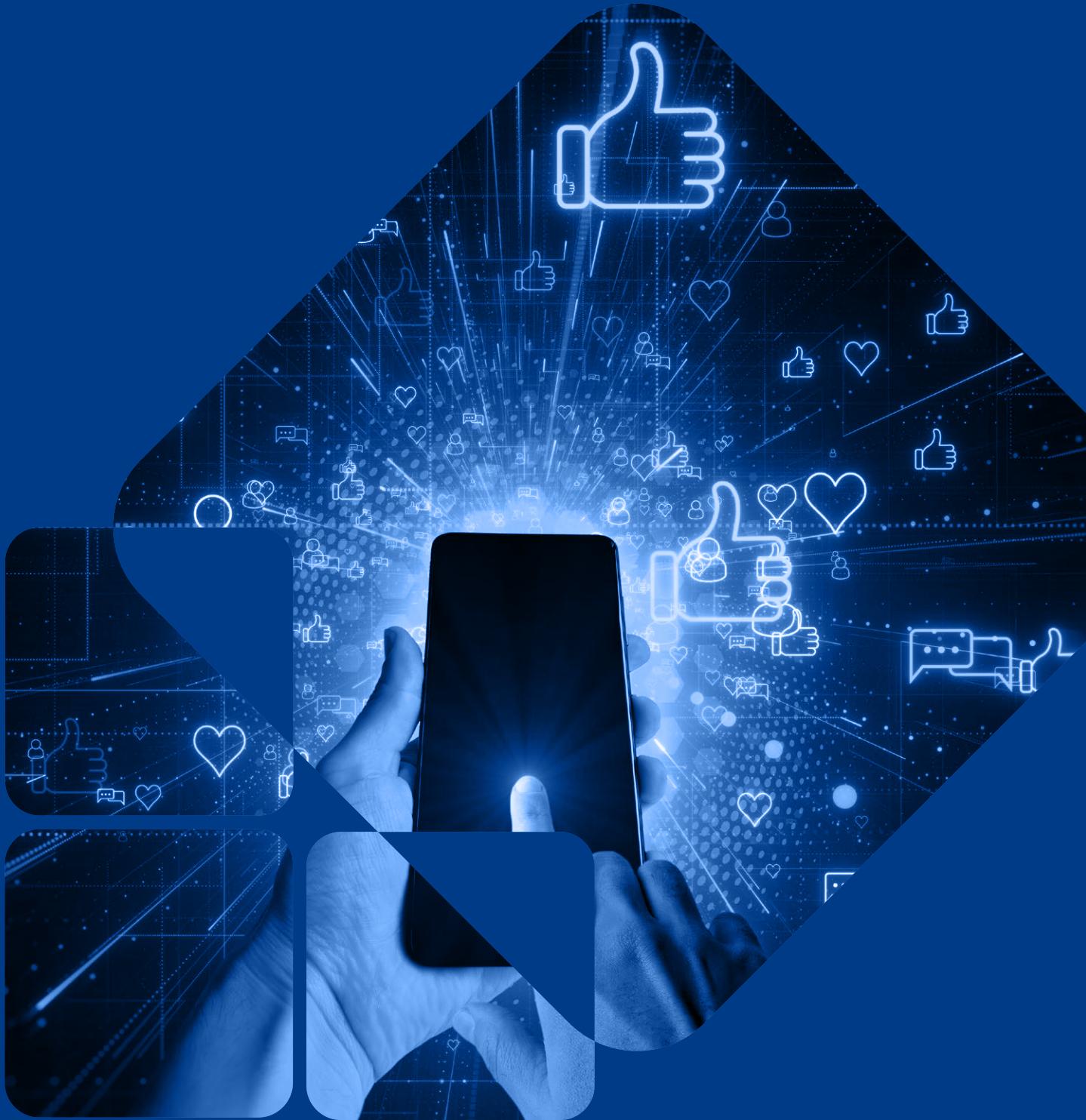
Once a year, HAKOM traditionally organises the "Day of New Technologies" conference for open dialogue with all interested stakeholders and promote topics in current areas of radiocommunications with the aim to foster innovation and implementation of new networks and technologies. 19

Najmanje jednom u godini organiziramo sastanak 5G radne skupine, koja uključuje operatore mreža pokretnih komunikacija, s ciljem rješavanja izazova u implementaciji postojećih mreža i tehnologija te radi poticanja uvođenja novih. 20

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	1.1	Control electro-magnetic field (EMF) levels	Number of measurements with published reports	50	Ongoing	RF Spectrum Monitoring Department	N
2	1.1	Issue certificates of compliance of radio stations	% of issued certificates within 60 days, for radio stations that comply with conditions	95%	Ongoing	RF Spectrum Management Department	N
3	1.1	Measuring campaign of key performance indicators for quality of mobile communications networks	Measurement report published	1	Q2/2026	RF Spectrum Monitoring Department	N
4	1.2	Publish coverage maps with calculated signal levels of mobile communications networks	Coverage map published	1	Quarterly	RF Spectrum Management Department	N
5	2.2	Manage the addressing and numbering space	% of issued Decisions on assignment/re-vocation/transfer of rights to use addresses and numbers within 15 days	90%	Ongoing	Communications Services Department	N
6	2.2	Plan and optimise radiocommunication networks	Number of issued parameters for planning new and optimising existing radiocommunication networks	100%	Ongoing	RF Spectrum Management Department	N
7	2.2	Harmonise the RF spectrum internationally	Implementing agreements on spectrum use with neighbouring countries	100%	Ongoing	RF Spectrum Management Department	N
8	2.2	Propose amendments to the allocation table when amending the Ordinance on the allocation of the RF spectrum	Yes/No	Yes	Ongoing	RF Spectrum Management Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
9	2.2	Resolve international interferences	% of reported interferences according to ITU procedures relative to detected ones	100%; 100%	Ongoing	RF Spectrum Monitoring Department	N
10	2.2	Resolve domestic interferences	% of removed interferences relative to identified	100%	Ongoing	RF Spectrum Monitoring Department	N
11	2.2	Measuring campaign – interferences from the Italian Republic	Internal measurement report; % of identified interferences reported according to ITU procedure	1; 100%	Q3/2026; Q4/2026	RF Spectrum Monitoring Department	N
12	2.2	Issue licence for the RF spectrum use based on submitted application	% of issued licences within 4/5 of legal deadline; % of licences issued within the deadline	85%; 100%	Ongoing	RF Spectrum Management Department	N
13	2.2	Prepare calculations and issue annual invoices for the RF spectrum use for valid licences	% of issued invoices within 30 days before calculation period	100%	Ongoing	RF Spectrum Management Department	N
14	2.2	Harmonise the RF spectrum internationally	% of coordination requests responded to in accordance with international deadline	0.98%	Ongoing	RF Spectrum Management Department	N
15	2.2	Ensure new VHF III radiofrequency resources for DAB+ systems, with reduced interferences	Number of new frequency allocations for DAB+	16	End of 2026	RF Spectrum Management Department	N
16	2.3	Measuring campaign WAS/ RLAN in the 5 GHz frequency band	Measurement report published	1	Q3/2026	RF Spectrum Monitoring Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
17	2.3	Maintain control and measuring system	Number of measuring locations in operation > 99% of the time	16	Ongoing	RF Spectrum Monitoring Department	N, 3232, 422
18	3.1	Harmonise with EU regulations in the field of RF spectrum management	% of regulations implemented within the deadline	95%	Ongoing	RF Spectrum Management Department	N
19	4.2	Hold "Day of New Technologies" annual conference	Conference held	1	Q2/2026	RF Spectrum Management Department	N, 3235
20	4.2	Conduct expert dialogue with market stakeholders within the 5G working group	Number of meetings annually	1	Q4/2026	RF Spectrum Management Department	N



DSA

DSA

Since February 2024, HAKOM has been acting as the national coordinator for the implementation of the Digital Services Act (DSA), taking an important regulatory role in ensuring a safe, responsible and transparent digital environment. This new competence focuses on protecting users from illegal and harmful content, increasing the responsibility of providers of intermediary services and strengthening regulatory cooperation at the European level. The 2026 Work Programme marks the phase of a full implementation of the regulatory framework and the fulfilment of the provisions of the Act on the Implementation of the DSA. Activities include the establishment of supervisory and enforcement mechanisms, developing protocols for cooperation with other bodies involved in the enforcement, education and advising of providers of digital services and building technical and analytical capacities of HAKOM. Particular attention will be paid to transparency and dissemination of information to the public, especially when the application of the DSA is in its beginnings.

Operational objectives

Strategic objective 1: User protection and market availability

Pursuant to Article 53 of the DSA, recipients of the service have the right to lodge a complaint 1 with HAKOM against a service provider alleging a breach of the DSA. In accordance with its powers, HAKOM will assess any complaints received and, if necessary, forward them to another competent national authority or coordinator of the Member State where the provider to which the complaint relates has its registered office.

In order to inform the public, service providers and other stakeholders about rights, obligations 2 and relevant procedures, HAKOM will publish relevant information related to the DSA on the website.

Strategic objective 3: Regulatory excellence and compliance

Pursuant to Article 55 of the Digital Services Act (DSA), HAKOM, as a digital services coordinator, 3 is required to draw up and publish once a year a report on its activities, which includes information on complaints referred to in Article 53, orders from the competent authorities referred to in Articles 9 and 10 and measures taken in relation to those orders. Since several competent authorities have been designated in the Republic of Croatia for the implementation of the Act, HAKOM will submit the consolidated annual report to the European Commission and the European Digital Services Committee and publish it on its website.

Pursuant to the Act on the Implementation of the DSA, in the role of a coordinator, HAKOM 4 will adopt an ordinance establishing the criteria and manner of certification of out-of-court dispute settlement bodies referred to in Article 21 of the DSA.

HAKOM will also adopt an ordinance establishing the criteria and procedure for awarding, 5 suspending or revoking the trusted flagger status, which will ensure transparent and objective conditions for obtaining that status in order to report illegal content more effectively.

The European Digital Services Committee is an advisory body that contributes to the consistent application and effective implementation of the DSA in all Member States. It consists of 6 representatives of national Digital Services Coordinators and the European Commission and it adopts guidelines, issues opinions and recommendations relating to the application of the DSA. HAKOM's representatives will participate regularly in the meetings of the Committee and actively participate in the work.

The European Digital Services Committee has set up eight working groups dealing with various 7 issues relevant to the DSA, such as horizontal and legal issues, interinstitutional cooperation, content moderation and data access, the integrity of the information space, consumer and online market protection, the protection of minors, orders and criminal issues and IT issues. HAKOM's representatives will actively participate in the work of all working groups.

As a Coordinator, HAKOM will regularly respond to questionnaires from the EC, the Coordinators of other Member States and other national and international bodies and/or organisations 8 aimed at the uniform implementation of the EU Digital Services Act.

According to the DSA, very large online platforms and search engines must provide vetted 9 researchers with access to their data. Upon receipt of an application from potential vetted researchers, HAKOM will carry out activities in accordance with Article 40 of the DSA, within the scope of its competences, including the transmission of applications to the European Commission and the Committee and cooperation with other competent authorities.

Throughout the year, HAKOM will convene and head meetings with other national competent 10 authorities as necessary for the purpose of harmonisation of the implementation of the DSA, exchange of information and ensuring effective bilateral and multilateral cooperation within the framework of national coordination.

We will maintain a dialogue with civil society organizations involved in the implementation of 11 the DSA and organize or participate in thematic meetings as needed.

Where the need arises, the DSA Coordinator has the right and obligation to initiate and participate in joint investigations of infringement of the DSA concerning service providers active in several Member States, or where the infringement affects the recipients of the services in 12 several Member States.

Strategic objective 4: Organisational agility and competence

Pursuant to the Act on the Implementation of the Digital Services Act, e-Provider DSA represents a system for registering providers of intermediary services and submitting notifications 13 on the provision of intermediary services. It was established in 2025 with the aim of identifying the entities subject to the DSA. In 2026, HAKOM will carry out activities to verify that all relevant stakeholders have submitted the notice and keep the system up to date.

HAKOM will continuously process intermediary service providers' applications for the entry in the European Commission Transparency Database in order to fulfil the obligations of reporting on content moderation set out in the DSA. 14

HAKOM will ensure that the public is more informed about the DSA regulation and citizens' rights, as well as about the obligations of online intermediaries and platforms, among other things, by organising a public event in cooperation with the Permanent Representation of the European Commission in the HR. 15

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	1.1	Follow up on complaints referred to in Article 53 of the DSA	% of complaints resolved	100%	Ongoing	Digital Services Sector	N
2	1.1	Update DSA content as part of HAKOM's web portal	number of updates	4	Q1 – Q4	Digital Services Sector	N
3	3.1	Report on activities referred to in Article 55 of the Digital Services Act	Report submitted to the European Commission and the Digital Services Committee	1	Q2	Digital Services Sector	N
4	3.1	Adopt the ordinance on the criteria and manner of certification of out-of-court settlement bodies	Ordinance published in OG	1	Q3	Digital Services Sector	N
5	3.1	Adopt the ordinance on the criteria and manner of awarding, suspending or revoking the trusted flagger status	Ordinance published in OG	1	Q1	Digital Services Sector	N
6	3.1	Participate in the work of the European Digital Services Committee	Contributions in the form of information and opinions	1	Q1 – Q4	Digital Services Sector	N
7	3.1	Participate in the work of Committee's working groups	Contributions in the form of information and opinions	1	Q1 – Q4	Digital Services Sector	N
8	3.1	Prepare and submit requested data to competent authorities	% of completed questionnaires	90%	Q1 – Q4	Digital Services Sector	N
9	3.1	Address applications for vetted researches	% of addressed applications	100%	Q1 – Q4	Digital Services Sector	N
10	3.1	Coordinate work of national competent authorities	National coordination system established	1	Q1 – Q4	Digital Services Sector	N
11	3.1	Dialogue with civil society	% of meetings	100%		Digital Services Sector/	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
12	3.1	Participate in joint international investigations	% of participation in joint investigations	100%	Q1 – Q4	Digital Services Sector	N
13	4.2	Maintain e-Provider system for entities subject to the Act on the Implementation of the DSA	System updated with entities subject to the DSA	1	Q1 – Q4	Digital Services Sector	N
14	4.2	Register providers in the European Commission database due to meeting the obligations of reporting and transparency	% of identified providers registered in the database	100%	Q1 – Q4	Digital Services Sector	N
15	4.2	Organise a public event in relation to the DSA with the Permanent Representation of the EC in the HR	Event organised	1	Q3	Digital Services Sector	N



HAKOM as an organisation

HAKOM as an organisation

Regulatory excellence and market compliance with the regulatory framework are related objectives. HAKOM will continue to be proactive and intensively involved in international cooperation to identify and address the challenges that will arise in a timely manner. Intensive international cooperation will take place in the framework of European regulators groups (BEREC, ERGP and IRG-Rail), CEPT, ITU, UPU, CERP, ECC, as well as in cooperation with the EC and EU working groups. Equal attention will be paid to domestic cooperation with all stakeholders with whom HAKOM has already developed relations. Cooperation will be expanded further with various stakeholders in the framework of the performance of tasks related to the coordination of the implementation of the DSA Regulation.

Following the introduction of the regulatory impact assessment (RIA) with the corresponding impact assessment methodology, HAKOM embarked on a systematic prior analysis of its regulatory decisions and the implementation of a better regulation policy. During the year, HAKOM will analyse the needs to improve its own RIA methodology and increase the number of regulatory decisions adopted with the prior implementation of RIA and obligatory public consultation with all stakeholders.

Achieving the strategic objectives of HAKOM for 2026-2028 requires continuous strengthening of its organisational capacities, adaptation of internal processes and development of managerial, analytical and operational capabilities. Organisational development includes investing in human resources, digitising operations, harmonising business practices with national and European requirements, quality management in HAKOM's organisation and improving internal coordination mechanisms. The Work Programme for 2026 is therefore focused on the implementation of those activities that enable a more efficient functioning of HAKOM as a modern, agile and open regulatory body. Priorities include development of the performance monitoring system, professional training of employees, strengthening internal and external communication and improving knowledge and information management and strengthening the organisational culture.

Monitoring the implementation of objectives

The implementation of the objectives of the Annual Work Programme is monitored in a structured and planned manner so as to ensure the timely execution of the planned activities, transparency and accountability within the organisation.

All objectives are planned in advance and followed up at least quarterly. Project-based objectives, especially those involving multiple and external stakeholders or complex implementation, are monitored monthly through defined progress indicators and milestones. Objectives and matters that are prioritised due to regulatory relevance, external impacts or internal resources are monitored weekly.

In this process, digital tools are used to record activities, track execution, manage deadlines and risks, and report transparently. Progress indicators and reference points that allow for the response to deviations are defined within those systems. Where unforeseen risks or significant deviations from planned objectives or deadlines are identified during monitoring, corrective actions are initiated, which may include redefining priorities, adjusting the timeframe, reallocating resources or additional coordination between organisational units.

The HAKOM Council and management are regularly involved in all levels of monitoring, ensuring strategic direction and coordination and risk management during the implementation of objectives.

Public consultation plan

Regulated area/ chapter in 2026 AWP	Objective No.	Operational objective	Start of public consulta- tion	Dura- tion (days)	Place of consulta- tion
Electronic com- munications	16	Update WACC values and additional risk premiums for VHCN networks	Q2/2026	30	e-Discussion
Electronic com- munications	17	Adopt methodol- ogy and model to conduct margin squeeze test (MST) in the dedicated capacity services market	Q2/2026	45	e-Discussion
Electronic com- munications	18	Complement the symmetrical regu- latory obligation	Q2/2026	30	e-Discussion
Electronic com- munications	23	Set regulated whole- sale prices	Q4/2026	30	e-Discussion
HAKOM	48	2027 Annual Work Programme	Q3/2026	30	e-Consultations
HAKOM	49	Financial Plan for 2027	Q3/2026	30	e-Consultations

Operational objectives

Strategic objective 3: Regulatory excellence and compliance

HAKOM's representatives regularly participate in working groups for the adoption of regulations 1 relevant to HAKOM's operations and activities and, by preparing responses and positions on legislative proposals, contribute to defining the legislative framework.

HAKOM will continue to participate in the regular legislative process of the European Union in 2 initiatives, such as the Digital Networks Act (DNA), the EU Delivery Act and the EU Railways Infrastructure Act.

HAKOM will also participate in the preparation of the positions of the HR in ordinary legislative 3 procedures and in the process of adopting EU strategic and policy documents. These positions are essential for the protection of national interests and adopting EU legislation tailored to Croatia's national needs.

HAKOM's role also includes participation in the work of the EU committees, as well as advisory bodies and working groups of the European Commission, ensuring the continuous exchange of information, alignment of positions and active involvement in decision-making processes. 4

HAKOM dedicates a significant engagement to active participation in the work of networks of European regulatory bodies such as the Body of European Regulators for Electronic Communications (BEREC), the European Regulators Group for Postal Services (ERGP) and the Independent Regulators' Group – Rail (IRG-Rail). The role in these bodies allows us to contribute to defining regulatory guidelines, exchanging expertise and harmonising regulatory practices among Member States. 5

Active participation in the work of the networks of European regulatory bodies implies work on expert and operational documents and requires us to be continuously involved in all developments in these bodies. 6

At the global level, HAKOM will continue to participate in the work of international organisations, in particular the International Telecommunication Union (ITU), contributing to the formulation of international standards, radiofrequency spectrum management and the development of global regulatory approaches. 7

At the national level, HAKOM will continue to work closely with the competent ministries and other state authorities, in particular in the context of: 8

- implementation of national strategies and policies in the field of electronic communications, post and rail, and digital sectors and cyber security;
- provision of expert and technical assistance in the preparation and adoption of national measures for transposition and implementation of EU legislation;
- coordination of activities between sectoral policies and European objectives.

HAKOM will submit all reports to the competent state authorities.

Following the integration of the regulatory impact assessment (RIA) in regular operations, HAKOM will continue to work continuously to improve its methodology for RIA and apply it consistently to all important decisions for the markets regulated by HAKOM. 9

HAKOM regularly issues expert opinions within its competence explaining certain provisions of the regulations and their application in practice. All expert opinions will continue to be published on HAKOM's website. 10

Through horizontal and cross-sectoral cooperation, HAKOM will foster coordinated action and exchange of knowledge and experiences with other national and international stakeholders, academic and expert institutions, with the aim of improving the regulatory framework and the situation in the markets regulated by HAKOM. 11

In order to increase transparency, regulatory predictability and make markets generally more compliant with regulations, in the last quarter of 2026, HAKOM will plan preventive inspection supervisions, which are primarily intended to remedy identified shortcomings that may distort the market situation. Part of the inspection supervisions will be planned as reactive, i.e. part of the time will be planned for cases in which someone reports an infringement of regulations or HAKOM will act ex officio. 12

HAKOM will prepare a report on the inspection supervisions carried out in 2025 and include the summary version and conclusions in the Annual Activity Report submitted to the Croatian Parliament. 13

Decisions of HAKOM may be subject to an administrative action as legal remedy, which is 14 decided by the Administrative Court or the High Administrative Court (depending on the subject-matter of the dispute). HAKOM will prepare the answers to the legal actions within 90 days or less.

Pursuant to the provisions of the ECA, HAKOM conducts administrative procedures to establish 15 the status of an infrastructure operator and a fee for the right of way. Such decisions are adopted on the basis of the request of real estate owners or public property managers, and 80% of the requests will be dealt with within less than 90 days.

HAKOM is one of the competent authorities for acting pursuant to the Act on Restrictive Measures and, based on decisions of competent courts in criminal proceedings, HAKOM provides operators with the imposed precautionary or security measures prohibiting access to the internet for implementation. The same will be done with regard to the blockage of IP addresses set by the Ministry of Finance due to unauthorised economic activity. 16

HAKOM will regularly launch foreclosure proceedings in cases of failure to pay and execute 17 financial obligations.

HAKOM will monitor legal changes by adjusting internal procedures and records in accordance 18 with regulations in the field of work and safety at work.

HAKOM will manage the documentation in accordance with the regulations and internal procedures of office management. 19

After the completion of the inspection procedure in which violations of regulations within the 20 competence of HAKOM are found, misdemeanour proceedings will be initiated in accordance with the provisions of the Misdemeanour Act.

Strategic objective 4: Organisational agility and competence

In order to ensure business continuity and the development of IS/IT in 2026, HAKOM will focus 21 on:

1. introduction of AI technology into operations (improvement of user experience, analytics and reporting systems and information security, possibility of implementation of AI technology on HAKOM's infrastructure);
2. modernisation of IT infrastructure: (hybrid cloud access, high availability and redundancy, optimised network infrastructure, modern server systems);
3. integrated business applications (connection to NIAS/e-Citizens, continuous development and maintenance);
4. advanced analytics and reporting (BI business intelligence platform, interactive dashboards, predictive analytics);
5. information security (implementation of HAKOM's Security and Operations Centre, implementation of the comprehensive information security management system (ISMS) in accordance with ISO 27001 and the Cyber Security Act (CSA), advanced security technologies, regular security vetting and testing, continuous education and awareness raising of employees);
6. modern working environment (flexible work options, collaborative platforms, modern tools and devices).

HAKOM will continue to digitise and modernise business processes to achieve high efficiency and improve the quality of services provided to users. Special attention will be paid to the digitalisation of internal operations and the implementation of new technologies and tools supported by AI in order to reduce the administrative burden and speed up decision-making. 22

HAKOM is continuously revising the project management methodology in order to ensure that it is aligned with the current needs of the organisation and therefore it will strive to fully align as many project-based objectives as possible with the methodology. 23

HAKOM has focused business process management activities on identifying, modelling, designing new processes and analysing and updating existing processes in order to optimise, digitise, improve and increase productivity. In accordance with the assuming of new powers and competences, HAKOM will model and integrate new business processes into the existing operations. 24

HAKOM will implement a pilot project for the use of AI in operations aimed at improving operational efficiency and ensuring greater reliability and consistency in the execution of business processes, while fostering practical experience with responsible and safe use of AI. Throughout the project life cycle, continuous training of employees on AI basics, relevant regulatory frameworks and security aspects will be carried out, with the aim of providing at least 50% of employees with formal evidence of education. At the end of the pilot project, HAKOM will draw up an impact analysis to assess improvements in the efficiency and/or reliability of the process. This initiative will strengthen the organisation by proactively and in a controlled manner adopting AI into regular work. 25

In the performance management system, which is currently being created, in 2026 HAKOM plans to operationalise all phases (target planning, monitoring, evaluation and rewarding), including support provided to employees, education and the development of the necessary rules, procedures and processes. 26

As part of the career development objective with the purpose of long-term retention and motivation of employees, during 2026 HAKOM will be dealing with defining career path models, competency development, mentoring and performance management system. 27

HAKOM will carry out ISO/IEC 27001 certification of its organisation to establish, maintain and continuously improve an effective information, cyber security and critical infrastructure management system. Certification is applied as an objective verification of the performance of the management system in place. This will confirm the effectiveness of the security risk management process and HAKOM's compliance with the applicable legislative and regulatory requirements, using recognised security management methods and practices. 28

In accordance with the Common Assessment Framework (CAF) methodology, HAKOM continuously conducts the self-assessment of the organisation. The assessment includes an evaluation of the implementation of previously adopted initiatives aimed at improving the quality management system (QMS). Based on the results, a final report on the QMS and a proposal for new initiatives defining further measures to increase efficiency and quality of work are prepared. This systematic approach ensures the continuous development and alignment of the quality management system with the highest professional standards and it will continue in 2026. 29

HAKOM will ensure responsible treatment of finances through public procurement procedures and by ensuring that contractual obligations are met. 30

HAKOM will perform its obligations to employees quickly and flawlessly: records of working hours, processing of employee registration and deregistration, preparing certificates and decisions, absence management (annual leaves, sick leaves, unpaid leaves), calculation and payment of employees' salaries and other material rights, and provision of information to employees on employment rights and obligations. 31

In 2026, HAKOM plans to conduct three new recruitment processes. HAKOM will conduct a transparent candidate selection procedure through a public vacancy announcement. 32

HAKOM regularly monitors the needs of employees for education and during the year HAKOM will organise the training of workers according to the needs observed. 33

Providing various forms of administrative support to organisational units in daily work is HAKOM's regular activity and aim. HAKOM will strive to ensure that support is delivered within less than three working days. 34

HAKOM will continue to systematically improve its organisational culture, i.e. to improve positive attitudes and values with the aim of creating and maintaining a motivating and responsible working environment. 35

In order to maintain dialogue with stakeholders in the markets regulated by HAKOM and for the purpose of maintaining transparency, visibility, market development and cooperation, HAKOM will organise expert conferences in the areas of electronic communications, rail, postal services, radiocommunications, DSA and on topics concerning persons with disabilities and children. 36

HAKOM will regularly update its intranet pages and website for better internal and external communication, while taking care of the accessibility of the content that is published. 37

The "Ask Us" application is one of the communication channels used. HAKOM will provide answers within an average of less than three days. 38

HAKOM's official profiles on social media are important channels for communication with the public. In addition to the releases, HAKOM will answer the questions received in an effort to keep the average time limit shorter than three days. 39

Throughout the year, HAKOM will continue to publish information content falling within its competence for social media users. 40

HAKOM will also regularly publish important news and other content of its website in English. 41

HAKOM will respond to all media inquiries as soon as possible. 42

For all important events or information falling within its competence, HAKOM will draft and publish the news or send a press release to the media. 43

HAKOM will regularly conduct public discussions/public consultations within appropriate deadlines. 44

In accordance with the ECA, HAKOM will submit the Annual Report for 2025 to the Croatian Parliament by the end of May 2026. The Financial Statement will be part of the Annual Report. 45

In the last quarter, HAKOM plans to adopt the Annual Work Programme for 2027, after a public consultation of at least 30 days. 46

In the last quarter, HAKOM plans to adopt the Financial Plan for 2027, after a public consultation of at least 30 days. 47

To make its regulatory activity more visible, HAKOM will develop an internal framework annual communication plan, which will be consistent with the Communication Strategy for the period 2026-2028. HAKOM will regularly update and monitor the implementation of the plan. 48

HAKOM is obliged to comply with the Act on the Right of Access to Information. HAKOM will respond to all requests within the legal deadline. 49

In order to improve internal communication, HAKOM will regularly prepare and distribute information to all employees through established communication channels (intranet, e-mail, notice boards, apps). 50

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
1	3.1	Monitor regulatory framework	% of prepared responses and positions on legislative proposals	90%	Ongoing	Legal Affairs Department	N
2	3.1	Participate in ordinary legislative procedure for the revision of the regulatory framework (DNA, EU Delivery Act)	% of official positions prepared for the TTE Council working group, COPPERER and Trialog	100%	Ongoing	Policy Implementation and Management Support Office	N
3	3.1	Prepare positions in procedures for the adoption of EU legislation and strategic and policy documents	% of positions prepared for the purposes of the permanent representation in Brussels	100%	Ongoing	Policy Implementation and Management Support Office, Legal Affairs Department	N
4	3.1	Work within the EU committees, advisory bodies and working groups of the European Commission	% of opinions prepared, % of questionnaires completed; number of meetings	100%; 100%; ?	Ongoing	Railway Services Sector; Postal Services Sector; Electronic Communications Sector; Digital Services Sector; Policy Implementation and Management Support Office	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
5	3.1	Work in the management bodies of the Network of Regulators (BEREC, ERGP, IRG-Rail)	% of meetings of the management bodies of the Network of Regulators (contact groups and plenary sessions)	100%	Ongoing	Railway Services Sector; Postal Services Sector; Electronic Communications Sector; Policy Implementation and Management Support Office	N
6	3.1	Work in the working groups of the Network of Regulators (BEREC, ERGP, IRG-Rail)	% of analyses of draft documents according to the annual work programme of the Network of Regulators	100%	Ongoing	Railway Services Sector; Postal Services Sector; Electronic Communications Sector; Policy Implementation and Management Support Office	N
7	3.1	Work in international organisations (ITU, ICAAN, OECD, etc.)	number of meetings	80	Ongoing	Railway Services Sector; Postal Services Sector; Electronic Communications Sector; Policy Implementation and Management Support Office	N
8	3.1	Work in national working groups to prepare national measures and report on their implementation	% of positions developed on proposals for national measures; % of reports submitted to competent national authorities	100%; 100%	Ongoing	Railway Services Sector; Postal Services Sector; Electronic Communications Sector; Digital Services Sector	N
9	3.1	Apply RIA for important decisions	% of important decisions adopted according to RIA methodology	100%	Ongoing	Executive Director Office	N, 3237

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
10	3.1	Draft expert opinions	% of published expert opinions on the application of regulations within the competence of HAKOM according to requests	100%	Ongoing	Legal Affairs Department	N
11	3.1	Strengthen inter-institutional cooperation and strategic partnerships to exchange information, coordinate action and share knowledge	% of contact points established for regular communication with relevant authorities (MSTI, MJPADT, MEEA, MPPCSA, CCA, AZOP, etc.)	80%	Ongoing	Railway Services Sector; Postal Services Sector; Electronic Communications Sector; Digital Services Sector; Policy Implementation and Management Support Office	N
12	3.2	Prepare the annual plan of inspection activities in 2027	Internal inspection plan	1	Q4	Policy Implementation and Management Support Office	N
13	3.2	Prepare the annual report on inspection activities	Internal report, summary version included in 2025AR	1	Q2	Policy Implementation and Management Support Office	N
14	3.2	Conduct administrative disputes	% of responses to legal actions prepared within 60 days	90%	Ongoing	Legal Affairs Department	N
15	3.2	Conduct administrative proceedings for determining the status of infrastructure operator	% of administrative proceedings closed within 90 days	80%	Ongoing	Legal Affairs Department	N
16	3.2	Proceed based on imposed precautionary measures, security measures, IP address blockages and restrictive measures within five days	% of procedures within five days	90%	Ongoing	Legal Affairs Department	N
17	3.2	Conduct foreclosure proceedings	Number of proceedings	35	Ongoing	Legal Affairs Department	N
18	3.2	Harmonize with current legal framework	Legislation implemented in organisation's bylaws	100%	Ongoing	Human Resources	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
19	3.2	Office management and general administrative support	% of registered and dispatched mail in accordance with legislation and internal procedures	100%	Ongoing	Human Resources	N
20	3.2	Initiate misdemeanour proceedings	% of misdemeanour proceedings initiated within 90 days from the date of completion of the inspection procedure	80%	Ongoing	Legal Affairs Department	N
21	4.1	Ensure business continuity of HAKOM's IS/IT	IS/IT internal development plan	1	Q4/2026	IS/IT	N, 3237, 3238
22	4.1	Digitise operations (e-Agency)	e-Agency internal development plan	1	Q4/2026	IS/IT	N, 3237, 3238
23	4.1	Manage projects	% of projects that are up-to-date and in line with the project methodology	80%	Q4	Communication and Business Standardisation Department	N
24	4.1	Manage processes	Number of updated processes and/or newly-developed processes	100	Q4	Communication and Business Standardisation Department	N
25	4.1	Implement and integrate AI in HAKOM	AI pilot project implemented	1	Q4/2026	Policy Implementation and Management Support Office	N, 412
26	4.1	Implement performance management system fully	Fair, clear and motivating framework established, in which all employees know what is expected of them and how their work is valued	100%	Q4	Human Resources	N
27	4.1	Prepare career development methodology in the organisation	Employee career development methodology prepared and adopted	1	Q4	Human Resources	N, 3237
28	4.1	Manage information, cybersecurity and critical infrastructure protection	Certificate 27001	100%	Ongoing	Policy Implementation and Management Support Office	N, 3237

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
29	4.1	Conduct internal assessment of the quality management system (QMS) with proposed improvement initiatives	Internal report	1	Q1	Communication and Business Standardisation Department	N, 3237
30	4.1	Draft contracts on purchase of goods and services	% of contracts drafted within five days	85%	Ongoing	Legal Affairs Department	N
31	4.1	Management personnel processes and records and track employee data administratively	% of procedures within three days with 0% errors	100%	Ongoing	Human Resources	N
32	4.1	Implement recruitment procedures and on-boarding of new employees	Number of recruitment procedures	1	Ongoing	Human Resources	N
33	4.1	Identify, organise and record employee training needs	% of employees participating in trainings	80%	Ongoing	Human Resources	N
34	4.1	Support organisational units operationally	% of procedures within five days	90%	Ongoing	Human Resources	N
35	4.1	Develop organisational culture continuously	Continuation of work on employee initiatives from the Development of Organisational Culture multi-annual project	80%	Ongoing	Human Resources	N, 3237
36	4.2	Organise events for dialogue and cooperation with stakeholders (in the markets HAKOM regulates)	Number of events	6	Ongoing	Communication and Business Standardisation Department	N, 3235
37	4.2	Edit HAKOM intranet pages and website	Average time from time of request to publication (in hours)	<= 24 hrs	Ongoing	Communication and Business Standardisation Department	N, 3238
38	4.2	Respond to queries received via website and publish replies	Average response time (in hours)	<= 72 hrs	Ongoing	Communication and Business Standardisation Department	N
39	4.2	Respond to comments/queries on social media	Average response time (in hours)	<= 72 hrs	Ongoing	Communication and Business Standardisation Department	N
40	4.2	Prepare content and posts on social media	Number of posts on social media	100	Ongoing	Communication and Business Standardisation Department	N

No.	Strategic priority	Operational objective	Outcome indicator	Planned value	Execution deadline	Competence	Source of financing
41	4.2	Translate content for publication on HAKOM website (ENG)	Average translation time	<= 24 hrs	Ongoing	Communication and Business Standardisation Department	N
42	4.2	Respond to media inquiries	% of inquiries answered within the requested time limit or within the following day	90%	Ongoing	Communication and Business Standardisation Department	N
43	4.2	Prepare press releases and news	average time to draft a release/news from the receipt of the request to prepare	<= 24 hrs	Ongoing	Communication and Business Standardisation Department	N
44	4.2	Manage public discussions	Average time to prepare a public discussion from the time of request	<= 24 hrs	Ongoing	Communication and Business Standardisation Department	N
45	4.2	Submit the 2025 Annual Activity Report of HAKOM to the Croatian Parliament and the Government of the HR	2025 Report submitted	1	Q2	Policy Implementation and Management Support Office	N, 3237
46	4.2	Adopt the 2027 Annual Work Programme of HAKOM	2027 Work Programme published	1	Q4	Policy Implementation and Management Support Office	N
47	4.2	Adopt the Financial Plan of HAKOM for 2027	Financial Plan for 2027 published	1	Q4	Finance, Accounting and Procurement Department	N
48	4.2	Prepare communication plan according to the Communication Strategy of HAKOM	The Plan prepared according to the Communication Strategy	1	Q1	Policy Implementation and Management Support Office	N
49	4.2	Process requests for access to information	% of requests answered within legal deadline	100%	Ongoing	Legal Affairs Department	N
50	4.2	Internal communication and publications	Average time from the time of preparation to publication (in hours)	<= 24 hrs	Ongoing	Human Resources	N

Annexes

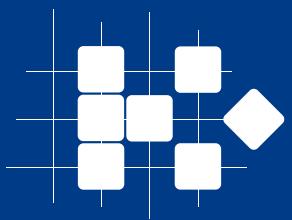
Description of accounts used in tables

ACCOUNT	ACCOUNT DESCRIPTION	2026 PLAN PROPOSAL*
31	Expenses for employees	19,393,501
311	Salaries (gross)	7,824,000
312	Other expenses for employees	1,790,200
313	Contributions on salaries	1,393,000
32	Material costs	6,332,801
321	Employees cost reimbursements	803,900
322	Material and energy expenses	504,200
323	Expenses for services	4,701,300
	3231 – Telephone, postal and transport services	205,600
	3232 – Current and investment maintenance services	409,200
	3233 – Marketing and information services	160,000
	3234 – Utility services	55,000
	3235 – Renting and leasing	1,692,500
	3236 – Health and veterinary services	70,000
	3237 – Intellectual and personal services	704,100
	3238 – Computer services	959,901
	3239 – Other services	445,000
329	Other unspecified operating expenses	323,400
34	Financial expenses	6,500
343	Other financial expenses	6,500
38	Other expenses	8,000
383	Fines, penalties and damages	8,000
41	Expenses for procurement of non-produced fixed assets	150,000
412	Intangible assets	150,000
42	Expenses for procurement of produced fixed assets	1,239,000
422	Plants and equipment	999,000
423	Means of transport	150,000
426	Intangible produced assets	90,000
45	Expenses for additional investments in non-financial assets	650,000
452	Additional investments in plants and equipment	50,000
453	Additional investments in means of transport	250,000
454	Additional investments in other non-financial assets	350,000

* The amounts in the table refer to the Financial Plan at the time of the adoption of the Annual Work Programme and may deviate in the case of revision.

The abbreviation "N" includes 31 – Employee expenses, 321 – Compensations of expenses to employees, 322 – Expenditures for materials and energy, 3231 – Telephone, postal and transport services, 324 – Compensation of expenses to unemployed persons, 329 – Other unmentioned operating expenditure.

The Financial Plan for 2026 is available at HAKOM website.



HAKOM