



Brussels, 19.3.2025
C(2025) 9008 final

DECISION OF THE EUROPEAN COMMISSION

on Former Commissioner Ylva Johansson's post term of office professional activities as member of the Board of 'Hammarby Fotboll' and as member of the Board of 'Elitfotboll Dam'

DECISION OF THE EUROPEAN COMMISSION

**on Former Commissioner Ylva Johansson's post term of office professional activities
as member of the Board of 'Hammarby Fotboll' and
as member of the Board of 'Elitfotboll Dam'**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on European Union,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to the Treaty establishing the European Atomic Energy Community,

Having regard to the Commission Decision of 31 January 2018 (C(2018) 700 final) on a Code of Conduct for the Members of the European Commission, and in particular Article 11(3) thereof,

Whereas:

- 1) According to Article 245(2) of the Treaty on the Functioning of the European Union, the Members of the Commission, when entering upon their duties, shall give a solemn undertaking that, both during and after their term of office, they will respect the obligations arising therefrom and, in particular, their duty to behave with integrity and discretion as regards the acceptance, after they have ceased to hold office, of certain appointments or benefits.
- 2) Article 339 of the Treaty on the Functioning of the European Union provides that the Members of the institutions of the Union shall be required, even after their duties have ceased, not to disclose information of any kind covered by the obligation of professional secrecy, in particular information about undertakings, their business relations or their cost components.
- 3) Article 11 of the Code of Conduct for the Members of the European Commission establishes a specific procedure for the assessment of planned professional activities which the Members or former Members of the Commission intend to take up after they have ceased to hold office. The Commission shall examine the information provided in order to determine whether the nature of the planned activity is compatible with Article 245 of the Treaty on the Functioning of the European Union. If the planned activity is related to the portfolio of the Member or former Member, the Commission shall decide only after having consulted the Independent Ethical Committee unless the planned activity falls within the exceptions foreseen in Article 11(3), second subparagraph.

- 4) On 20 February 2025, Former Commissioner Ylva Johansson's notified her envisaged post term of office professional activities as member of the Board of 'Hammarby Fotboll' and as member of the Board of 'Elitfotboll Dam'.
- 5) Ms Johansson explained that 'Hammarby Fotboll' is a Swedish football club with teams in the highest Swedish leagues for both men and women and involved in a broad range of activities in football for children and youth. She also explained that 'Elitfotboll Dam' is a Swedish association of 28 female football clubs with teams in the highest and second highest Swedish leagues for women football.
- 6) Ms Johansson provided additional information on 'Hammarby Fotboll' and on 'Elitfotboll Dam' on 26 February 2025.
- 7) Ms Johansson explained that 'Hammarby Fotboll' is a non-profit organization owned by its 27.000 members. The members select a board that is responsible for running the organisation. Ms Johansson has been invited to be a member of that board. Ms Johansson further indicated that 'Hammarby Fotboll' is a big football club where thousands of children and teenagers play football. 'Hammarby Fotboll' is the majority owner of a public limited company (Hammarby Fotboll AB) that runs the two top-teams of the club: the male and the female premier teams that play in the highest Swedish league. The company ('Hammarby Fotboll AB') is where big sponsor contracts, buying and selling players take place. Ms Johansson underlined that 'Hammarby Fotboll' has no financial links with the Commission.
- 8) On 'Elitfotboll Dam', Ms Johansson explained that this organization promotes and coordinates women's football. The 14 female football teams in the highest Swedish league ('OBOS Damallsvenskan') and the 14 female football teams in the second highest league ('Elitettan') are the 28 members of the organisation. 'Elitfotboll Dam' also represents Swedish women's football in some international fora like Women's League Forum and UEFA. 'Elitfotboll Dam' owns the commercial rights of the two national leagues ('OBOS Damallsvenskan' and 'Elitettan'). Ms Johansson underlined that 'Elitfotboll Dam' has no financial links with the Commission.
- 9) Further research on 'Hammarby Fotboll' revealed that this club, commonly known as 'Hammarby IF, is a professional football club based in Stockholm. It was founded in 1889 and expanded into various sports. Hammarby's men's team competes in 'Allsvenskan', Sweden's top-tier football league, while Hammarby's women's team plays in 'Damallsvenskan', the highest division for women's football. The club is also invested in youth development through its structured academy system, the Hammarby Talent Program, which nurtures young talent and prepares them for professional football.
- 10) Beyond its sporting activities, 'Hammarby Fotboll' is involved in community engagement notably with the initiatives "*Samhällsmatchen*" ('The Social Match'), a program dedicated to social responsibility, which focuses on education, employment

support, and using football as a tool for social integration. The club also runs programs aimed at helping refugees, disadvantaged youth, and people with disabilities, ensuring that football is accessible 'to everyone.

- 11) A significant portion of 'Hammarby Fotboll' 's revenue comes from TV rights and league agreements, particularly through Sweden's top football leagues and international broadcasting deals. 'Hammarby Fotboll' is also funded through a combination of sponsorship deals, ticket sales, merchandise, broadcasting rights, and membership contributions.
- 12) 'Hammarby Fotboll''s main financial backers include major sponsors and partners such as Svenska Spel, Craft, Pulsen Group, Nordic Wellness (a Swedish training club), Grönsakshuset,(a family-owned vegetable supplier), Never Offside (a digital platform provider), Projob Workwear, Intersport, Convini, Marginalen Bank, Bosphorus matkluster, Unibet, etc
- 13) Open-sources research on 'Elitfotboll Dam' reveals that this organisation functions as a coordinating body for its member clubs, aiming to promote collaboration among its member clubs and to advance women's elite football in Sweden. It collaborates closely with the Swedish Football Association and other stakeholders to enhance the sport's growth and professionalism. The organization holds the commercial rights for 'OBOS Damallsvenskan' and 'Elitettan', encompassing media rights, player agreements, and partnerships beneficial to the leagues and their member clubs.
- 14) 'Elitfotboll Dam' advocates for gender equality in football working on initiatives that aim to close the financial and structural gap between men's and women's football in Sweden. Through lobbying efforts and collaboration with the Swedish Football Association and FIFA, 'Elitfotboll Dam' pushes for policies that support equal pay, and better facilities and facilitates participation in UEFA Women's Champions League and other international competitions.
- 15) One of 'Elitfotboll Dam's key activities is league organization and administration. The organization sets the framework for league operations, ensuring that matches, schedules and regulations adhere to national and international standards. It also works on improving the quality of officiating and implementing fair play policies, creating a professional and well-structured competition for clubs and players.
- 16) Beyond league management, 'Elitfotboll Dam' is involved in player and club development. The organization provides support to clubs in areas such as coaching education, talent scouting, and youth academies. It also collaborates with national and regional bodies to strengthen the pathway from youth football to the professional game.
- 17) In 2023, 'Elitfotboll Dam' adopted a new strategic plan focussing on creating an attractive player environment, promoting professional and sustainable club

development, and strengthening the commercial aspects of the sport. The vision is to achieve world-class player development and serve as a model for women's football in Europe through increased professionalism, commercialization, and fan engagement

- 18) 'Elitfotboll Dam' is funded through a mix of sponsorships, broadcasting rights, league agreements and public funding. The organization negotiates sponsorship and broadcasting deals to increase revenue and visibility for women's football. By securing long-term partnerships with brands and media companies, EFD ensures that clubs receive financial support and that matches are widely accessible to fans. Key financial contributors include Svenska Spel, which has a major sponsorship agreement with Swedish women's football, as well as corporate partners like OBOS, ICA, and Pulsen Group. Additionally, funding from the Swedish Football Association and UEFA development programs supports the growth of women's football in Sweden. Revenue also comes from TV rights and broadcasting deals, particularly through agreements with media companies that cover Damallsvenskan and Elitettan, Sweden's top women's football leagues
- 19) Ms Johansson's envisaged activities as member of the Board of 'Hammarby Fotboll' and as member of the Board of Elitfotboll Dam' are not related to her former Commission portfolio on Home Affairs. In substance, these activities do not present any risk of incompatibility with her functions as Member of the Commission or with the interests of the institution, knowing nonetheless that the general obligations set out in Article 245 of the Treaty on the Functioning of the European Union and in the Code of Conduct for the Members of the European Commission continue to apply. It appears particularly relevant to recall, in line with article 11(4) of the Code of Conduct, the prohibition of lobbying the Commission, during a period of two years after Ms Johansson's term of office, for 'Hammarby Fotboll' and for 'Elitfotboll Dam', including for the interests of the entities supporting these two entities.

HAS DECIDED AS FOLLOWS:

Article 1

Former Commissioner Ylva Johansson's envisaged professional activities as member of the Board of 'Hammarby Fotboll' and as member of the Board of 'Elitfotboll Dam' are compatible with Article 245(2) of the Treaty on the Functioning of the European Union, subject to the respect of the obligations stemming from the Treaty on the Functioning of the European Union, namely Article 245, and from the Code of Conduct for the Members of the Commission .

Article 2

In particular, in accordance with Article 11(4) of the Code of Conduct for the Members of the Commission, Former Commissioner Johansson shall refrain from lobbying the

Members of the Commission or their staff on behalf of ‘Hammarby Fotboll’ and of ‘Elitfotboll Dam’, including for the interests of the entities supporting or cooperating with Hammarby Fotboll’ and ‘Elitfotboll Dam’.

Done at Brussels, on 19 March 2025.

The President
Ursula von der Leyen