

Opinion
of the
Independent Ethical Committee
established
by the European Commission
14 January 2026

Subject: Request for an opinion on Former Vice-President of the European Commission Vera Jourová’s envisaged post term of office activity for the Global Commission and Democracy and Multilateralism (established by Club de Madrid)

On request of the President of the European Commission, the Independent Ethical Committee, composed of Ms Elisabeth Morin-Chartier, Ms Alexandra Prechal and Ms Gertrud Ingestad, delivers the present opinion:

Procedure

1. On 31 October 2025, Former Vice-President (VP) of the European Commission for Values and Transparency Vera Jourová informed the Commission of her intention to accept a non-remunerated assignment as Commissioner of the Global Commission on Democracy and Multilateralism ⁽¹⁾ (GCDM), established by the forum of democratic former Presidents and Prime Ministers ‘Club de Madrid’⁽²⁾.
2. On 24 November 2025, the Secretary-General of the European Commission asked the Committee, on behalf of the President of the Commission, to deliver an opinion on the compatibility of this envisaged post-term of office activity with Article 245 of the Treaty on the Functioning of the European Union (TFEU).

Facts

3. The GCDM has been established by Club de Madrid, an independent, non-profit association incorporated under Spanish law. It is a forum currently gathering 131 members ⁽³⁾, aiming to strengthen democratic practice.

⁽¹⁾ [Global Commission on Democracy and Multilateralism Project | Club de Madrid](#), last consulted on 17 December 2025.

⁽²⁾ [Club de Madrid - World leadership alliance](#), last consulted on 17 December 2025.

⁽³⁾ [About Club de Madrid](#), last consulted on 18 December 2025.

4. Members offer their expertise on a pro bono basis. The organisation's primary objective is to promote good governance, foster democratic resilience and encourage inclusive leadership on a global scale. As a global network, it provides serving leaders with impartial, non-partisan advice and access to a comprehensive platform for dialogue and policy exchange.⁽⁴⁾
5. According to its website, the GCDM seeks to reconnect and strengthen the relationship between democratic governance and multilateral cooperation. It aims to align democracy promotion with multilateral renewal — identifying practical, politically feasible pathways to make global governance more accountable, participatory, and rights-based.⁽⁵⁾

Activities of the GCDM

6. According to its website, the GCDM's work focuses on enhancing cooperation across the United Nations, regional organisations, and democratic alliances, ensuring that institutional innovation and political vision go hand in hand.⁽⁶⁾
7. It aims to deliver actionable proposals to reform and strengthen the way multilateral and plurilateral frameworks support democracy worldwide, based on in-depth research and structured dialogue.⁽⁷⁾
8. The findings and recommendations of the GCDM will be presented in 2026 at the Club de Madrid Annual Policy Dialogue, accompanied by a global advocacy and communication effort.⁽⁸⁾

Governance of the GCDM

9. The GCDM does not constitute an independent legal or financial entity. Rather, it operates under the administrative and financial management of Club de Madrid. The GCDM's expenditures, including meetings, consultations, and dissemination activities are therefore managed and by Club de Madrid.
10. The GCDM itself comprises 19 High-Level Commissioners and three thematic Working Groups, led by partner institutions: (1) Revitalising Support for Democracy within the UN System, (2) Reinforcing Democratic Norms through Regional Mechanisms, and (3) Innovating Democratic Cooperation through Plurilateralism.
11. The GCDM is supported by a Content Director who ensures thematic coherence and drafts the final report and a Steering Committee, composed of the Club de Madrid

⁽⁴⁾ [organisation detail - Transparency register - European Union](#), last consulted on 17 December 2025.

⁽⁵⁾ [Global Commission on Democracy and Multilateralism Project | Club de Madrid](#), last consulted on 18 December 2025.

⁽⁶⁾ [Global Commission on Democracy and Multilateralism Project | Club de Madrid](#)

⁽⁷⁾ [Global Commission on Democracy and Multilateralism Project | Club de Madrid](#)

⁽⁸⁾ [Global Commission on Democracy and Multilateralism Project | Club de Madrid](#)

Secretariat, the Content Director, and the Working Group Leads, which coordinates overall strategy and implementation.⁽⁹⁾

Funding of Club de Madrid

12. Pursuant to the information disclosed in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission⁽¹⁰⁾, Club de Madrid's funding is derived from a diverse range of sources, including grants, European Union funding, public financing and charitable donations.
13. In the year 2024, Club de Madrid reported a total budget of €3.37 million, which included €218,046 from European Union programmes.

Links between Club de Madrid and the European Commission

14. Club de Madrid engages with EU institutions on a wide range of topics, including democracy, foreign affairs, digital policy, migration, and multilateral cooperation. Since 2020, it held 11 official meetings with European Commissioners and senior European Commission officials, including one with Former VP Jourová. ⁽¹¹⁾

Former VP Jourová's envisaged position

15. Former VP Jourová explained that members of the GCDM (Commissioners) are expected to bring insights from diverse political systems and institutional contexts, providing the GCDM with strategic vision, political credibility, and knowledge.
16. Specific responsibilities include: (a) Leading the agenda-setting process and validating the thematic priorities of the Working Groups; (b) Identifying key political and institutional opportunities for impact; (c) Engaging regularly through structured meetings (in-person and virtual) to assess the political context and review the emerging work of the Working Groups; (d) Providing strategic guidance and shaping the political direction of the Commission's recommendations; (e) Ensuring coherence across workstreams and translating expert analysis into proposals with political traction; (f) Endorsing the concise package of recommendations presented in the Final Report; (g) Playing an active role in disseminating the findings and advocating for their uptake at key multilateral and regional fora.
17. The envisaged activity is non-remunerated. Travel and accommodation for official sessions or events may be reimbursed or arranged directly by Club de Madrid in accordance with its internal procedures and available project funding.
18. Former VP Jourová provided details on the expected work of the GCDM over its two chronological phases, the whole spanning approximately one year. During a Phase I

⁽⁹⁾ [CdM GCDM Commissioners](#)

⁽¹⁰⁾ [organisation detail - Transparency register - European Union](#), last consulted on 17 December 2025.

⁽¹¹⁾ [organisation detail - Transparency register - European Union](#)

(Framing and Evidence Gathering), Commissioners set the agenda of the Working Groups and identify priorities and opportunities for impact. During a Phase II (Deliberation and Recommendations), Commissioners collaborate with the Working Groups with a view to producing recommendations, which in turn will be disseminated to relevant policy actors and communities.

Legal context

19. Article 245 TFEU provides:

The Members of the Commission shall refrain from any action incompatible with their duties. Member States shall respect their independence and shall not seek to influence them in the performance of their tasks.

The Members of the Commission may not, during their term of office, engage in any other occupation, whether gainful or not. When entering upon their duties they 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. In the event of any breach of these obligations, the Court of Justice may, on application by the Council acting by a simple majority or the Commission, rule that the Member concerned be, according to the circumstances, either compulsorily retired in accordance with Article 247 or deprived of his right to a pension or other benefits in its stead.

20. Article 15(1) and (2) of the Charter of Fundamental Rights of the European Union provides:

1. Everyone has the right to engage in work and to pursue a freely chosen or accepted occupation.

2. Every citizen of the Union has the freedom to seek employment, to work, to exercise the right of establishment and to provide services in any Member State.

21. Article 2(7) of the Code of Conduct for the Members of the European Commission (hereafter the ‘Code of Conduct’) provides:

7. Former Members shall respect the obligations arising from their duties that continue to have an effect after their term, in particular the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits in line with Article 245 of the Treaty on the Functioning of the European Union, and the obligations specified in this Code of Conduct.

22. Article 5 of the Code of Conduct provides:

1. *Members shall comply with the duty of loyalty towards the Commission and discretion in discharging their duties. They shall act and express themselves with the restraint that their office requires.*
2. *Members shall refrain from disclosing what is said at meetings of the Commission.*
3. *Without prejudice to the disciplinary provisions applicable to officials and other agents, Members are responsible for the proper handling and any external transmission by members of their Cabinets of classified documents, of sensitive information or of confidential documents submitted to the College for adoption or information.*
4. *Members shall not make any comment that would call into question a decision taken by the Commission or which may harm the Commission's reputation.*

23. Article 11 of the Code of Conduct provides:

1. After ceasing to hold office, former Members shall continue to be bound by their duty of integrity and discretion pursuant to Article 245 of the Treaty on the Functioning of the European Union. They shall continue to be bound by the duties of collegiality and discretion, as laid down in Article 5, with respect to the Commission's decisions and activities during their term of office.

2. Former Members shall inform the Commission with a minimum of two months' notice of their intention to engage in a professional activity during a period of two years after they have ceased to hold office. For the purposes of the present Code, 'professional activity' means any professional activity, whether gainful or not, other than any unpaid activity which has no link with the activities of the European Union and which does not give rise to lobbying or advocacy vis-à-vis the Commission and its services such as:

(a) charitable or humanitarian activities;

(b) activities deriving from political, trade unionist and/or philosophical or religious convictions;

(c) cultural activities;

(d) the mere management of assets or holdings or personal or family fortune, in a private capacity;

(e) or comparable activities.

3. 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, and if the planned activity is related to the portfolio of the former Member, it shall decide only after having consulted the Independent Ethical Committee.

Without prejudice to the possibility for the President to seek its opinion in cases of doubt, the Independent Ethical Committee does not need to be consulted where former Members intend to:

- (a) continue to serve the European interest in an Institution or Body of the European Union;*
- (b) take up functions in the national civil service of a Member State (at national, regional or local level)*
- (c) engage with international organisations or other international bodies dealing with public interests and in which either the EU or one or several of its Member States are represented;*
- (d) engage in academic activities;*
- (e) engage in one-off activities for a short duration (1 or 2 working days);*
- (f) accept honorary appointments.*

4. Former Members shall not lobby Members or their staff on behalf of their own business, that of their employer or client, on matters for which they were responsible within their portfolio for a period of two years after ceasing to hold office.

5. In the case of a former President, the periods set out in paragraphs (2) and (4) shall be three years.

6. The duties set out in paragraphs (2) and (4) shall not apply where the former Member is engaging in public office.

7. Decisions taken under paragraph (3) determining compatibility with Article 245 of the Treaty on the Functioning of the European Union and related opinions of the Independent Ethical Committee shall be made public with due consideration to the protection of personal data.

Opinion

24. The Committee notes that Members of the Commission have a right to engage in work and to pursue a freely chosen or accepted occupation after the term of their office. This right needs to be balanced with the obligations set out in Article 245 TFEU and the Code of Conduct, which develops these obligations in more detail.

25. The Committee first notes that the GCDM's activities are linked with the portfolio of Former VP Jourová, who was Vice-President for 'Transparency and Values'. As such,

Former VP Jourová was directly responsible with improving and defending democratic governance.

26. As Commissioner of the GCDM, Former VP Jourová would play an active role in shaping the work of the GCDM, with a view to producing operational recommendations. While this role may involve advocacy to disseminate the recommendations of the GCDM, it does not involve any lobbying or responsibilities in securing funding for the GCDM or Club de Madrid.
27. The Committee notes that the objectives of the GCDM and Former VP Jourová's involvement are not for profit and aim to achieve objectives that are widely shared, including by the European Union.
28. The Committee therefore considers that Former VP Jourová's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union.
29. The Committee concludes that, in its view, this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union.
30. The Commission might however wish to recall that Former VP Jourová remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying⁽¹²⁾ Members or staff of the European Commission on behalf of Club de Madrid on matters for which she was responsible within her portfolio for a period of two years after ceasing to hold office. This does not affect a participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.
31. The decision should also recall the confidentiality obligation laid down in Article 339 of the Treaty on the Functioning of the European Union, as well as the general obligations set out in Article 11(1) of the Code, in conjunction with Article 5. These Articles provide that former Members of the Commission continue to be bound by the duty of integrity and discretion as well as by the duties of collegiality and discretion with respect to the Commission's decisions and activities during their term of office.
32. Finally, the decision should also recall that, according to Article 13(2) of the Code of Conduct, former Members of the Commission shall inform the President in a timely

⁽¹²⁾ The term 'lobbying' means any activity carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission as set out in Article 3 of Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register; it includes indirect lobbying on behalf of clients through indirect measures with the same objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission such as organising or participating in meetings, conferences, events or consultation or hearings, organising communication campaigns or the preparation of position papers and applies independently of the location; it also covers any activity with a view to obtaining EU funding.

manner if they have doubts with regard to the application of this Code before acting on the matter relating to which the doubts arise.

Elisabeth Morin-Chartier

Gertrud Ingestad

Alexandra Prechal