

**Opinion**  
of the  
**Independent Ethical Committee**  
established  
by the European Commission  
**28 February 2025**

**Subject: Request for an opinion on Former Vice-President of the European Commission Vera Jourová's envisaged post term of office activity for GLOBSEC**

On request of the President of the European Commission, the Independent Ethical Committee, composed of Mr Allan Rosas, Ms Elisabeth Morin-Chartier, and Mr Jerzy Plewa, delivers the present opinion:

**Procedure**

1. On 31 January 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 Former Vice-President (VP) of the European Commission for Values and Transparency Vera Jourová's envisaged post-term of office activity for 'GLOBSEC' with Article 245 of the Treaty on the Functioning of the European Union (TFEU).

**Facts**

2. GLOBSEC is a globally recognised think tank dedicated to shaping the global debate through research activities and connecting key experts on foreign and security policy. It is based in Bratislava, Slovakia.<sup>(1)</sup>
3. Its mission focuses on addressing critical challenges in global security, sustainability, digital transformation, and democratic resilience, while enhancing security, prosperity, and sustainability in Europe and beyond.
4. By fostering public-private dialogue, GLOBSEC provides a platform for collaboration across sectors, shaping future agendas and promoting international cooperation. GLOBSEC advocates for European values, while contributing to the development of a more stable, prosperous, and sustainable world.

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<sup>(1)</sup> [www.globsec.org](http://www.globsec.org), last consulted on 14 February 2025.

### *Activities of GLOBSEC*

5. According to the Transparency Register of the European Parliament, the Council of the European Union and the European Commission <sup>(2)</sup>, the main events organised by GLOBSEC are the GLOBSEC Forum (one of the leading conferences on global security in the world) and the annual GLOBSEC Tatra Summit (a conference that provides the ground for expert and political discussions on the future of Europe). GLOBSEC's website mentions a third “flagship” event: the Château Béla Central European Strategic Forum (an exclusive annual gathering providing a platform for dialogue between policymakers, thinkers, non-governmental experts, business leaders and elected officials from multiple fields and countries).
6. Research fellows from the GLOBSEC Policy Institute publish regular analyses and respond to current challenges.
7. According to its website, GLOBSEC's activities are devoted to research in seven thematic areas: Cyber Resilience, Danube Tech Valley, Democracy and Resilience, Economic Growth and Sustainability, Future of Security, Global Europe and Ukraine and Eastern Europe.

### *Governance*

8. The governance structure of GLOBSEC includes an Executive Committee, an Office of the President, a Board of Directors providing strategic oversight, an International Advisory Council comprising experts from diverse fields and a Women Leaders Council promoting gender equality and gender perspectives.

### *Funding*

9. According to Former VP Jourová, GLOBSEC is funded through a mix of grants, sponsorships, and partnerships with government bodies, private sector entities, and philanthropic organisations. She mentioned that the organisation discloses its funding sources annually and evaluates contributions to prevent potential conflicts of interest, particularly concerning its research and policy recommendations.
10. According to the Transparency Register of the European Parliament, the Council of the European Union and the European Commission (the “Transparency Register”), GLOBSEC received €428,200 in EU grants in 2023. This funding was distributed as follows: €294,400 from the European Education and Culture Executive Agency (Citizens and EU Values programme) and €133,800 from the European Research Executive Agency (Inclusive Society programme). For the year 2024 <sup>(3)</sup>, the total EU grants increased to €509,200, with €294,400 again coming from the Citizens and EU

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<sup>(2)</sup> Link to the GLOBSEC's profile on the Transparency Register: [organisation detail - European Union](#), last consulted on 14 February 2025.

<sup>(3)</sup> According to the most recent update (22 October 2024) made by GLOBSEC on the EU Transparency Register at the date of last consultation (14 February 2025).

Values program, €160,000 from the Inclusive Society programme, and €54,800 from the European Health and Digital Executive Agency (Digital Europe programme).

11. GLOBSEC estimated the annual costs related to its activities covered by the Transparency Register to fall within the range of €400,000 to €499,999.

#### *Links between GLOBSEC and the European Commission*

12. According to the Transparency Register, Former VP Jourová participated in four meetings with GLOBSEC in 2020 and 2023, including discussions on disinformation held in Bratislava on 29 May 2023 and an online panel at the GLOBSEC 2020 Bratislava Forum, where the future of democracy in a post-COVID world was explored. GLOBSEC also held meetings with Former VP Jourová's cabinet members. These meetings included preparatory discussions for the GLOBSEC Forum and addressed issues such as election security, resilience in the transatlantic information space, and digital challenges to democracy.
13. The President's Cabinet was also involved in several high-level roundtable discussions with GLOBSEC. These included events in July 2020 that examined the EU's global engagement during the COVID-19 crisis, the European Green Deal, and the state of the Union.
14. Still according to the Transparency Register, GLOBSEC submitted contributions to the EU action against abusive litigation targeting journalists and rights defenders, which is linked to Former VP Jourová's responsibilities in safeguarding media freedom and protecting democratic values. Additionally, its contribution to the European Democracy Action Plan consultation aligns with Former VP Jourová's work on combating disinformation. GLOBSEC also contributed to the roadmap on the Delegated Regulation on data access under the Digital Services Act, which features a link to Former VP Jourová's efforts to ensure transparency in the online environment.

#### *Former VP Jourová's envisaged position*

15. According to the information provided by Former VP Jourová, the activity would include two roles, both non-executive, non-remunerated, and advisory.
16. First, Former VP Jourová would be part of the Czech preparatory board and lead the international advisory programme board of the upcoming GLOBSEC Forum in June 2025. This would entail being part of a small group of advisors helping with its preparations, providing advice to the executive level on the agenda and speakers at the Forum.
17. Second, Former VP Jourová would advise GLOBSEC's Centre for Global Europe, providing general advice on the directions and focus of its analytical activities as well as strategic dialogue on policies related to EU's global position.

18. The Centre for Global Europe is the centre responsible for the abovementioned “Global Europe” thematic area of GLOBSEC’s activities.
19. According to GLOBSEC’s website, GLOBSEC’s Centre for Global Europe “provides constructive ideas and promotes innovative policy recommendations to ensure that the European Union remains an attractive, successful, and viable project that is setting global norms and defining the international system. With an office in Brussels, the Center is a hub for analysis and strategic dialogue on EU policies shaping Europe’s global standing”. Its webpage indicates that it is co-funded by the European Union but does not provide additional details. <sup>(4)</sup>
20. Former VP Jourová expected her role to begin on 1 February 2025. However, the beginning of the activity is conditional upon the authorisation of the European Commission.

### **Legal context**

21. 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.*

22. 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.*

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<sup>(4)</sup> [Centre for Global Europe | GLOBSEC - A Global Think Tank: Ideas Shaping the World](#), last consulted on 14 February 2025.

*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.*

23. 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.*

24. 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.*

25. 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**

26. 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.
27. The Committee first notes that GLOBSEC's activities cover many subjects. While most of them are not related to Former VP Jourová's portfolio of "Values and Transparency, the Committee considers that this is the case for some of them. This is the case in particular of the activities of GLOBSEC's Centre for Democracy and Resilience.
28. As part of the Czech preparatory board to the upcoming GLOBSEC Forum in June 2025 and adviser to GLOBSEC's Centre for Global Europe, Former VP Jourová would carry out an advisory function. This role does not involve any lobbying or responsibilities in securing funding for the organisation.
29. The Committee notes that the objectives of GLOBSEC and Former VP Jourová's involvement are not for profit and aim to achieve objectives that are widely shared, including by the European Union.
30. 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.
31. The Committee concludes that, in its view, this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union.
32. 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<sup>(5)</sup> Members or staff of the European Commission on behalf of GLOBSEC on

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<sup>(5)</sup> 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.

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.

33. Given the fact that the envisaged activity is related to Former VP Jourová's portfolio, 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.
34. 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 manner if they have doubts with regard to the application of this Code before acting on the matter relating to which the doubts arise.

Allan Rosas

Jerzy Plewa

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