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## **DECISION OF THE EUROPEAN COMMISSION**

**on Former Commissioner Johannes Hahn's post term of office professional activity as  
Chairperson of the Centre Condorcet's High-Level Group 'Managing Sustainability  
Transition'**

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### **on Former Commissioner Johannes Hahn's post term of office professional activity as Chairperson of the Centre Condorcet's High-Level Group 'Managing Sustainability Transition'**

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,

Considering that:

Whereas:

- 1) According to the second paragraph of Article 245 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 paragraph 3, second subparagraph, lit. (a) to (f).

- 4) On 27 March 2025, Former Commissioner Hahn informed the Commission about the invitation addressed to him to chair a High-Level group on managing sustainability transition, in the framework of the independent tripartite High-Level Group on EU Policy Innovation, established by Centre Condorcet. Former Commissioner Hahn served as Commissioner for Regional Policy (2010-2014), as Commissioner for Neighbourhood Policy and Enlargement Negotiations (2014- 2019) and as Commissioner for Budget and Administration (2019-2024) . Since 14 May 2025, and until 31 March 2026, he is Special Adviser to the President with the following mandate: ‘Special Envoy for Cyprus, to contribute to the efforts of reaching a comprehensive settlement within the United Nations framework’.
- 5) In this notification, Former Commissioner Hahn explained that the Centre Condorcet is a not-for-profit entity governed by Belgian law, registered in the European Transparency Register as a think tank, whose reports are published on its website. Former Commissioner Hahn clarified that his activity would not entail a salary, but his actual costs would be reimbursed.
- 6) Former Commissioner Hahn attached substantial information to his notification, providing additional extensive clarifications on the nature and scope of his envisaged activity:
- 7) The Centre Condorcet’s independent tripartite High-Level Groups are temporary public-private think tanks, laboratories for innovative ideas, independent and tasked to ‘think outside-the-box’, with a composition of members from national governments, corporations, universities, and the Commission.
- 8) These High-Level Groups have five main objectives: (1) Investigate ideas for incremental or radical policy innovation, in line with new contextual conditions, and outside treaties and procedural constraints; (2) Based on foresight and science, move beyond vested policy pathways and develop feasible policy recommendations to achieve future strategic goals; (3) Align divergent views and interests and improve mutual trust and consensus between members, with a broader multiplying potential; (4) Contribute to improving policy cross-fertilisation, synergy and coherence; and (5) Facilitate future political agreement in the formal decision-making procedure.
- 9) The first High-Level Group was launched in 2011 by the Polish Council Presidency and subsequent groups were established by other presidencies, inspired by the concept of informal discussions among key stakeholders and experts.
- 10) The participants in the High-Level Groups engage in discussions in their personal capacity, without representing any specific organisation or mandate, to foster an environment of trust, creativity, and open exchange of ideas. These discussions are facilitated by a neutral chair and are subject to the ‘Chatham House’ rules, which ensure that no comments or statements are attributed to individual participants publicly.

- 11) Each High-Level Group operates on a consensus-based approach, where all recommendations are agreed upon by all members. The final reports, which reflect the collective views of the group, are issued under the joint responsibility of the chair and the executive director of the High-Level Group. The target groups for the recommendations of the High-Level Groups' recommendations are the Commission and the Council, with no advocacy allowed.
- 12) Former Commissioner Hahn's intended activity as chairperson of the High-Level Group on managing sustainability transition will entail a four-fold role: (1) Steering the discussions of the high-level group towards practically useful outcomes; (2) Facilitating consensus-building among participants regarding policy strategy recommendations; (3) Inviting relevant issues for inclusion on the agenda; and (4) Approving the final report to the EU Commission and Council.
- 13) The High-Level Group's day-to-day operations are managed by an Executive Director, who is supported by a team of researchers. Former Commissioner Hahn's work will encompass virtual meetings lasting approximately two hours (occurring about three times a year) and in-person meetings, including a team-building dinner and a half-day meeting (the latter held at least annually). The High-Level Group is supported by a secretariat, organised by Centre Condorcet, which prepares, with support from academic members or experts, discussion papers and staff draft meeting reports for comment and approval by the Chairperson.
- 14) Building upon Former Commissioner Hahn's notification and the additional information attached thereto, the Commission acknowledged that, within the overall thematic of policy innovation, the specific objective of Former Commissioner Hahn's notified post term of office activity would be to propose operational improvements in the EU institutions, continuing work previously carried out. In view of the wide range of topics that might be covered by Former Commissioner Hahn's future chairpersonship of the High-Level Group and of the wide scope of his former Commission portfolio on 'Budget and Administration', the Commission could not exclude from the outset that the notified activity be linked to Former Commissioner Hahn's previous Commission portfolio.
- 15) Against this framework, the Independent Ethical Committee was requested, on 7 April 2025, to deliver its opinion on the compatibility of the notified activity with Article 245 of the Treaty on the Functioning of the European Union.
- 16) The Independent Ethical Committee delivered its opinion on 23 May 2025. The Committee first established the relevant facts regarding the Centre Condorcet, namely its activities, its target groups, its governance and its funding. The Committee subsequently assessed the nature of Former Commissioner Hahn's envisaged activity, taking into account the link between his work in the framework of the Centre Condorcet and his former functions as Member of the European Commission. The Committee then assessed the legal context applicable and drew its conclusions on the compatibility of the envisaged activity vis-à-vis the legal context.

- 17) The Committee underlined that Centre Condorcet is a think tank, based in Brussels, promoting the enlightenment values of reason and humanism. It seeks to foster innovative thinking on European and global challenges, particularly regarding systemic change, foresight, and governance. The Committee also noted that according to the Transparency Register of the European Parliament, the Council of the European Union and the European Commission, the Centre Condorcet is affiliated to the International Network for Governmental Science Advice (INGSA).
- 18) The Committee noted that, unlike traditional think tanks focusing on specific EU policy proposals, the Centre Condorcet facilitates tripartite dialogues between public, private, and academic sectors. Its work focuses on the operational transformation of research from universities and other institutions, testing ideas through expert discussions and organising its own platforms to facilitate expert dialogue: High-Level Groups on EU Policy Innovation.
- 19) The Committee underlined that these High-Level Groups cover broad multi-disciplinary issues, such as sustainability transition financing, new trade parameters and EU neighbourhood policy, green technology investments, Africa-EU partnerships and agricultural and forestry system innovations. Furthermore, the Committee observed that High-Level Groups offer a space for creative policy brainstorming among key stakeholders, filling a gap left by formal Council meetings and working groups.
- 20) The Committee underlined that Centre Condorcet's website mentions nine High-Level Groups: three under the category 'Becoming a responsible global actor' and six under the category 'Transforming the economy', which includes the High-Level Group 'Managing Sustainability Transition'.
- 21) As regards Centre Condorcet's activities, the Committee indicated that the Centre does not directly engage in lobbying or advocate for specific legislation but contributes to broader EU policy discussions through research and publications. The Committee furthermore underlined some of the elements above mentioned captured in the additional information attached by Former Commissioner Hahn to his notification.
- 22) As for the Centre Condorcet's funding, the Committee noted that the Transparency Register indicates, for the year 2022, a total budget of €135,000, with nine contributors, mostly from the private sector.
- 23) The Committee highlighted that Former Commissioner Hahn was invited to chair the High-Level Group 'Managing Sustainability Transition' and recalled the four roles expected from Former Commissioner Hahn as chairperson (cf. recital 11 above). The Committee underlined that Former Commissioner Hahn will not be remunerated, but his actual costs are reimbursed.
- 24) The Committee emphasised that Former Commissioner Hahn's name is currently appearing on the Centre Condorcet's website as Chairperson-Designate of the High-

Level Group <sup>(1)</sup> indicating that the focus of the work the working group is to make European energy more competitive by reducing its cost.

- 25) The Committee recalled that the Centre Condorcet is listed in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission and according to the information contained therein, the Centre Condorcet does not receive EU grants. The Committee also noted that, over the past ten years, the Centre had two registered meetings with Commission representatives.
- 26) The Committee then recalled the legal framework applicable to the assessment of the post term of office activities of former Members of the Commission and eventually concluded on the restrictions and conditions deemed necessary in order to ensure the compatibility of Former Commissioner Hahn's envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.
- 27) As a preliminary consideration, the Committee noted that former 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 for the Members of the European Commission, which develops these obligations in more detail.
- 28) The Committee noted that the envisaged activity is limited to the specific High-Level Group 'Managing Sustainability Transition' and does not encompass all the fields of interest of Centre Condorcet. The Committee considered that the objective of making the European energy more competitive is indirectly linked to Former Commissioner Hahn's portfolio responsibilities, which included the EU budget.
- 29) The Committee considered that Former Commissioner Hahn's role as the chairperson mainly consists in organising and steering the work of the High-Level Group and does not involve any lobbying or responsibilities in securing funding for Centre Condorcet. The Committee furthermore noted that the objectives of Centre Condorcet and Former Commissioner Hahn's involvement are not for profit and aim to help the European Union in its policymaking.
- 30) The Committee therefore considered that Former Commissioner Hahn's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union and concluded that the activity would be compatible with Article 245 of the Treaty on the Functioning of the European Union.
- 31) The Committee suggested nevertheless that the Commission recalls that Former Commissioner Hahn remains bound by Article 11(4) of the Code of Conduct, laying

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<sup>(1)</sup> [https://www.highlevelgroup.eu/files/ugd/b299b9\\_06a903ea6dd54b04936862f6a8a8e4a7.pdf](https://www.highlevelgroup.eu/files/ugd/b299b9_06a903ea6dd54b04936862f6a8a8e4a7.pdf), last consulted on 17 May 2025.

down the obligation to refrain from lobbying <sup>(2)</sup> Members or staff of the European Commission on behalf of Centre Condorcet on matters for which he was responsible within his 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.

- 32) The Committee also considered that the Commission's decision should also recall the confidentiality obligation laid down in Article 339 TFEU, 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.
- 33) Finally, the Committee considered that the Commission's decision should 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 the Code of Conduct for the Members of the European Commission before acting on the matter relating to which the doubts arise.
- 34) Subject to the above-mentioned restrictions the Committee concluded that Former Commissioner Hahn's envisaged activity would be compatible with Article 245 of the Treaty on the Functioning of the European Union.
- 35) The Commission has considered the Committee's opinion and shares its conclusions.

HAS DECIDED AS FOLLOWS:

#### Article 1

Former Commissioner Hahn's envisaged post term of office professional activity as chair of the Centre Condorcet's Independent Tripartite High-Level Group 'Managing Sustainability Transition' is compatible with Article 245 of the Treaty on the Functioning of the European Union, subject to the respect of the conditions and restrictions set out in Articles 2 and 3.

#### Article 2

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<sup>(2)</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.

- 1) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Commissioner Hahn shall refrain from disclosing or using information of the kind covered by the obligation of professional secrecy that he obtained as Member of the Commission, in particular information about undertakings, their business relations or their cost components;
- 2) In line with Article 11(1) of the Code of Conduct for the Members of the Commission, in conjunction with Article 5 of the Code, Former Commissioner Hahn remains bound by the duties of collegiality and discretion, with respect to the Commission's Decision and activities during his term of office. He shall not disclose what was said at meetings of the Commission and shall apply a high sense of discretion with regard to the use of information and insights that he obtained during his mandate in relation to the performance of his portfolio obligations and, in general, in relation to his duties as Member of the Commission;
- 3) Under Article 11(4) of the Code of Conduct, Former Commissioner Hahn shall refrain from lobbying the Commission on behalf of the Centre Condorcet for a period of two years after the end of his mandate, not only on matters for which he was responsible within his former Commission portfolio, but also on all matters in which he was involved at College level as Member of the Commission. This does not affect a possible participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff;
- 4) In line with Article 13(2) of the Code of Conduct for the Members of the Commission, Former Commissioner Hahn shall inform the President of the Commission, in a timely manner, if and when he has a doubt with regard to the application of the present Decision or the Code of Conduct in general before acting on the matter in relation to which the doubt arises.

Done at Strasbourg, on 17 June 2025.

*The President*  
*Ursula von der Leyen*