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DECISION OF THE EUROPEAN COMMISSION

on Former Commissioner Janez Lenarčič's post term of office activity as Head of the OSCE Election Observation Mission for the Armenian parliamentary election scheduled for 7 June 2026

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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 24 March 2026, Former Commissioner Janez Lenarčič informed the Commission of his intention to accept a possible remunerated assignment as Head of the OSCE/ODIHR Election Observation Mission for the Armenian parliamentary election, scheduled for 7 June 2026. Former Commissioner Lenarčič explained that at the time of his notification, the envisaged assignment was expected to run from 22 April 2026 to 17 June 2026 and was dependent on the outcome of the OSCE/ODIHR's selection process, due to take place as from 6 April 2026.
- 5) Based in Warsaw, the OSCE's Office for Democratic Institutions and Human Rights (ODIHR) works with governments, civil society, and international organisations to promote stability, security, and human rights in the OSCE area. More precisely, the ODIHR is responsible for promoting democracy, human rights, and the rule of law in the OSCE region. Its main activities include: (1) Election observation and assistance; (2) Human rights monitoring and reporting; (3) Democracy and governance support; (4) Rule of law and human rights capacity-building; (5) Tolerance and non-discrimination initiatives.
- 6) The ODIHR has an annual budget funded by all participating States of the OSCE, in accordance with applicable scales of contributions. It is led by a Director appointed by consensus of all participating States ⁽¹⁾.
- 7) Former Commissioner Lenarčič underlined the ODIHR's leading role in election observation in Europe, North America, and Central Asia, as well as the critical importance, both for Armenia and for Europe, of the forthcoming Armenian parliamentary election. He added that if appointed as Head of the OSCE/ODIHR election observation mission to the Armenian elections, he will lead the core team of international observers, will coordinate the work of long-term and short-term observers, will interact with the relevant authorities, and will prepare and deliver interim reports during the election campaign, a statement of preliminary findings, the conclusions following election day, and a final report on the elections.
- 8) Former Commissioner Lenarčič's envisaged activity is not linked to his former Commission portfolio on Crisis Management.
- 9) As for the substance, the notified activity does not present any risk of incompatibility with Former Commissioner Lenarčič's former functions as Commissioner in charge of Crisis Management or with the interests of the institution, provided that he abides by the relevant provisions of the Treaty on the Functioning of the European Union, notably Article 339, and of the Code of Conduct for the Members of the Commission, namely Article 11, in conjunction with Article 5, as concerns the protection of confidentiality of sensitive information and the protection of collegiality and discretion.

⁽¹⁾ Former Commissioner Lenarčič was Director of the ODIHR from 2008 to 2014.

HAS DECIDED AS FOLLOWS:

Sole Article

Former Commissioner Janez Lenarčič's possible assignment as Head of the OSCE Election Observation Mission for the Armenian parliamentary election, scheduled for 7 June 2026, is compatible with the second paragraph of Article 245 of the Treaty on the Functioning of the European Union, subject to the respect of the duties set out in Article 339 of the Treaty on the Functioning of the European Union and in Article 11(1), in conjunction with Article 5, of the Code of Conduct for the Members of the European Commission.

Done at Brussels, on 22 April 2026

The President
Ursula von der Leyen