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DECISION OF THE EUROPEAN COMMISSION

**on Former Vice-President Věra Jourová's post term of office professional activity as
Commissioner at the Global Commission on Democracy and Multilateralism**

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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 31 October 2025, Former Vice-President Jourová informed the Commission of her intention to accept a non-remunerated assignment as Commissioner at the Global Commission on Democracy and Multilateralism.
- 5) Former Vice-President Jourová explained that the Global Commission on Democracy and Multilateralism has been established and is led by the Club de Madrid, which serves as the Secretariat and Technical Coordinator for the Global Commission on Democracy and Multilateralism.
- 6) Former Vice-President Jourová further noted that the Club de Madrid is an independent, non-profit organisation comprising more than 100 democratic former Heads of State and Government. The Club de Madrid presents itself as being the largest forum of former Heads of State and Government working to strengthen democratic practice.
- 7) Former Vice-President Jourová underlined that the Global Commission on Democracy and Multilateralism seeks to leverage the potential of multilateral frameworks to promote democratic governance. It explores how democratic values can reinforce the legitimacy and effectiveness of multilateral cooperation. In response to declining trust in global institutions and democratic backsliding, the Commission identifies actionable ways to align democracy promotion with multilateral renewal, focusing on how international cooperation can better respond to citizens' aspirations for accountable, participatory, and rights-based governance.
- 8) Former Vice-President Jourová added that the Global Commission on Democracy and Multilateralism aims to offer forward-looking proposals that are policy-relevant, politically feasible, and institutionally innovative. Its work intends to support reform-oriented engagement across the UN system, regional organisations, and emerging coalitions of democratic actors. Its priorities include identifying institutional opportunities, clarifying the value of democratic multilateralism, promoting coherence across democracy-support mechanisms, and providing actionable policy guidance.
- 9) Former Vice-President Jourová underlined that the Global Commission on Democracy and Multilateralism's activities, including research coordination, consultations, and publication of the final report, are implemented under the supervision of the Club de Madrid's Secretariat. In addition, Former Vice-President Jourová provided further details on the expected work of the Global Commission on Democracy and Multilateralism over its two chronological phases, the whole spanning approximately one year.
- 10) As regards the structure of the Global Commission on Democracy and Multilateralism, Former Vice-President Jourová explained that it is composed of: (1) 14 High-Level Commissioners, including democratic former Heads of State and Government; (2) Three thematic Working Groups, led by partner institutions; (3) a Content Director

who ensures thematic coherence and drafts the final report; (4) a Steering Committee which coordinates overall strategy and implementation.

- 11) More precisely, as regards the thematic working groups, Former Vice-President Jourová mentioned the following: (1) Revitalising Democracy within Global Institutions led by International IDEA; (2) Reinforcing Democratic Norms through Regional Mechanisms led by the European Democracy Hub; (3) Innovating Democratic Cooperation through Multilateralism led by Open Government Partnership.
- 12) As regards the position offered to her, Former Vice-President Jourová explained that Commissioners are expected to bring insights from diverse political systems and institutional contexts, providing the Commission with strategic vision, political credibility, and deep knowledge. 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.
- 13) Former Vice-President Jourová provided additional details on the non-remunerated nature of her envisaged assignment. She explained that Commissioners participate on a voluntary basis, in keeping with the public-service and non-profit character of the initiative, adding that travel and accommodation for official sessions or events may be reimbursed or arranged directly by the Club de Madrid in accordance with its internal procedures and available project funding.
- 14) Former Vice-President Jourová also explained that the Global Commission on Democracy and Multilateralism does not constitute a separate legal or financial entity; rather, it operates under the administrative and financial management of the Club de Madrid. The Commission's expenditures, including meetings, consultations, and dissemination activities are therefore managed and accounted for by Club de Madrid, in line with its governance and donor transparency standards.
- 15) As regards the Club de Madrid's budget, Former Vice-President Jourová underlined that it combines public grants, contributions from partner institutions, and project-specific donor support.
- 16) The envisaged activity such as notified by Former Vice-President Jourová is related to her former Commission portfolio on 'Values and Transparency'. The Independent

Ethical Committee was therefore requested, on 24 November 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.

- 17) The Committee delivered its opinion on 14 January 2026. The Committee first established the facts regarding: (1) the nature of the Global Commission on Democracy and Multilateralism and its relation with the Club de Madrid; (2), the activities of the Global Commission on Democracy and Multilateralism; (3) its governance structure; (4) the funding of Club de Madrid; (5) the links between the Club de Madrid and the European Commission; and (6) the precise scope of Former Vice-President Jourová's envisaged position.
- 18) The Committee acknowledged the information provided by Former Vice-President Jourová on the the nature and activities of the Global Commission on Democracy and Multilateralism, on its relation with the Club de Madrid and on the governance structure of the Club de Madrid.
- 19) As regards the funding of the Club de Madrid, the Committee noted that, pursuant to the information disclosed in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission ⁽¹⁾, Club de Madrid's funding is derived from a diverse range of sources, including grants, European Union funding, public financing and charitable donations. In the year 2024, Club de Madrid reported a total budget of €3.37 million, which included €218,046 from European Union programmes.
- 20) As regards the links between Club de Madrid and the European Commission, the Committee noted that the 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 Vice-President Jourová.
- 21) Finally, on Former Vice-President Jourová's envisaged position, the Committee underlined the information provided by the former Vice-President, according to which the members of the Commissioners of the Global Commission on Democracy and Multilateralism are expected to bring insights from diverse political systems and institutional contexts, providing the Global Commission on Democracy and Multilateralism with strategic vision, political credibility, and knowledge. The Committee underlined that 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

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

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.

- 22) The Committee noted that Former Vice-President Jourová's envisaged activity is non-remunerated. Travel and accommodation for official sessions or events may be reimbursed or arranged directly by the Club de Madrid in accordance with its internal procedures and available project funding.
- 23) The Committee subsequently 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 Vice-President Jourová's envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.
- 24) 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.
- 25) The Committee noted that the activities of the Global Commission on Democracy and Multilateralism are linked with Former Vice-President Jourová's portfolio for 'Transparency and Values', which encompassed the subject of improving and defending democratic governance.
- 26) The Committee furthermore noted that as 'Commissioner' of the Global Commission on Democracy and Multilateralism, Former Vice-President Jourová would play an active role in shaping the work of the Global Commission on Democracy and Multilateralism, with a view to producing operational recommendations. While this role might involve advocacy to disseminate the recommendations of the Global Commission on Democracy and Multilateralism, it does not involve any lobbying or responsibilities in securing funding for the Global Commission on Democracy and Multilateralism or the Club de Madrid.
- 27) The Committee also noted that neither the objectives of the Global Commission on Democracy and Multilateralism nor Former Vice-President Jourová's involvement are

for profit and that both aim to achieve objectives that are widely shared, including by the European Union.

- 28) The Committee concluded that Former Vice-President Jourová's envisaged activity does not represent a risk with regard to the interests of the Commission and of the European Union and that in its view, this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union.
- 29) The Committee nevertheless recommended that the Commission recalls that Former Vice-President Jourová remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying ⁽²⁾ 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.
- 30) The Committee also recommended that the Commission recalls 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.
- 31) Finally, the Committee recommended that the Commission decision 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.
- 32) The Commission has considered the Committee's opinion and shares its conclusions.

⁽²⁾ 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.

HAS DECIDED AS FOLLOWS:

Article 1

Former Vice-President Věra Jourová's envisaged post term of office activity as Commissioner at the Global Commission on Democracy and Multilateralism 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 Article 2.

Article 2

- 1) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Vice-President Jourová shall refrain from disclosing or using information of the kind covered by the obligation of professional secrecy that she 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 Vice-President Jourová remains bound by the duties of collegiality and discretion, with respect to the Commission's decisions and activities during her term of office. She 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 she obtained during her mandate in relation to the performance of her portfolio obligations and, in general, in relation to her duties as Member of the Commission.
- 3) In line with Article 11(4) of the Code of Conduct for the Members of the Commission, Former Vice-President Jourová shall refrain from lobbying the Commission on behalf of the Club de Madrid on matters for which she was responsible within her former Commission portfolio, for a period of two years after ceasing to hold office, i.e. until 30 November 2026. 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 Vice-President Jourová shall inform the President of the Commission, in a timely manner, if and when she 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 10 February 2026.

The President
Ursula von der Leyen