



Brussels, 9.12.2021  
C(2021) 8862 final

**COMMUNICATION TO THE COMMISSION**

**ON THE PUBLICATION OF INFORMATION CONCERNING OCCUPATIONAL  
ACTIVITIES OF SENIOR OFFICIALS AFTER LEAVING THE SERVICE  
(ARTICLE 16, FOURTH PARAGRAPH OF THE STAFF REGULATIONS)**

**Annual Report 2021**

## COMMUNICATION TO THE COMMISSION

### ON THE PUBLICATION OF INFORMATION CONCERNING OCCUPATIONAL ACTIVITIES OF SENIOR OFFICIALS AFTER LEAVING THE SERVICE (ARTICLE 16, FOURTH PARAGRAPH OF THE STAFF REGULATIONS)

#### Annual Report 2021

On the basis of Article 16 of the Staff Regulations<sup>1</sup>, officials, after leaving the service, continue to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits. Those former officials who intend to engage in an occupational activity within 2 years of leaving the service shall inform the institution thereof in order to enable it to take an appropriate decision in this respect and, when necessary, to forbid an activity or give the approval subject to appropriate restrictions.

The third paragraph of Article 16 of the Staff Regulations stipulates that for former senior officials the Appointing Authority shall, in principle, prohibit them, during the 12 months after leaving the service, from engaging in lobbying or advocacy vis-à-vis staff of their former institution for their business, clients or employers on matters for which they were responsible during the last three years in the service.

The fourth paragraph of Article 16 of the Staff Regulations provides that, in compliance with the relevant data protection rules<sup>2</sup>, each institution shall publish annually information on the implementation of the third paragraph, including a list of the cases assessed.

The Commission explains below the criteria it has chosen in order to ensure the implementation of its obligation, and presents its analysis. In annex to this publication, the Commission provides summary information in relation to the decisions taken under this provision.

The Commission, in its publication, is basing itself on its obligation under the fourth paragraph of Article 16 of the Staff Regulations in combination with the relevant data protection rules<sup>3</sup>.

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<sup>1</sup> As last amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013 (OJ L 287, 29.10.2013, p. 15).

<sup>2</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

<sup>3</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

## **The criteria applied to implement the third paragraph of Article 16 of the Staff Regulations**

### *Definition of senior officials*

In line with the third paragraph of Article 16 of the Staff Regulations the following categories of staff are concerned:

- Directors-General or Deputy Directors-General (including officials that have been called upon to occupy temporarily such posts in accordance with Article 7(2) of the Staff Regulations) and ‘Hors Classe’ Advisors, having exercised either of these functions at any time during the last 3 years before leaving the service;
- Directors (including officials that have been called upon to occupy temporarily such post in accordance with Article 7(2) of the Staff Regulations) and Principal Advisers, having exercised either of these functions at any time during the last 3 years before leaving the service;
- Heads of Cabinet, having exercised such function at any time during the last 3 years before leaving the service.

### *The decision making procedure in the case of the third paragraph of Article 16 of the Staff Regulations*

Declarations by former senior managers about an envisaged activity are processed as any such declaration by all staff. The Directorate-General for Human Resources and Security receives the declaration and collects the views of the former service(s) in which the former official has worked during the last 3 years of service, the respective cabinet(s), the Secretariat-General, the Legal Service and the Joint Committee. It is on the basis of these different views that the final decision is taken by the Appointing Authority.

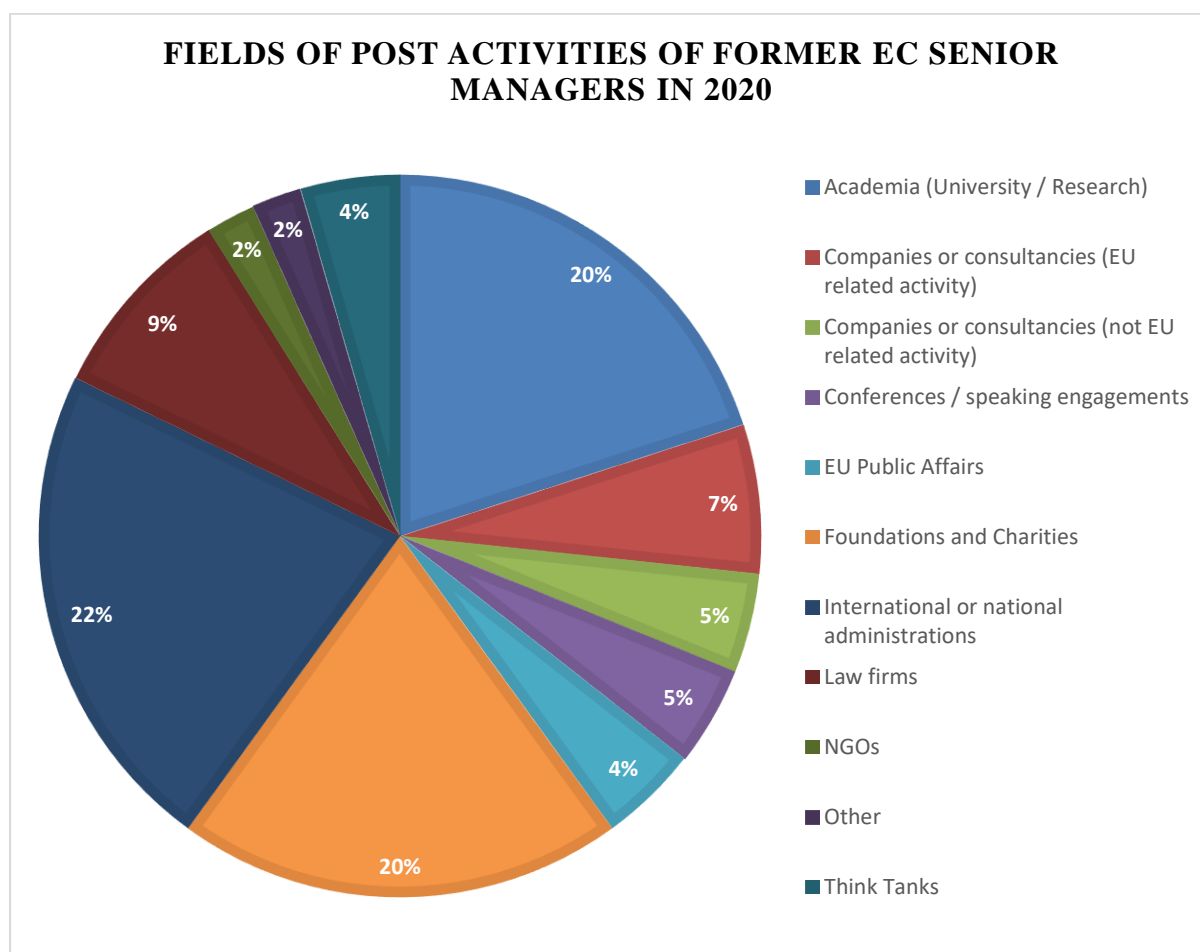
### *Occupational activities declared by former senior managers in 2020*

In 2020, the Commission adopted 33 decisions under Article 16 of the Staff Regulations for declarations lodged by 22 former senior managers. These declarations concerned 45 occupational activities. Some declarations included more than one activity, and consequently the related Appointing Authority decision covered all the requested activities.

For the purpose of reporting and statistical analysis, the fields covered by the declared post-service activities have been grouped into 10 different categories.

Of the 45 activities that were declared, 13 fell out of the temporal scope of the third paragraph of Article 16 of the Staff Regulations as they took place after more than 12 months since the former senior managers who declared them left the service. Of the 32 activities that fell in the above mentioned temporal scope, 15 activities could potentially give rise to, or entail, lobbying or advocacy vis-à-vis staff of the former senior manager’s former institution on matters for which they were responsible during the last 3 years in the service, as stated in the third paragraph of Article 16 of the Staff Regulations, as further analysed below.

The pie chart below summarises the occupational activities fields of former senior managers who received a decision by the Appointing Authority in 2020.



*The occupational activities concerned by the Report*

The activities as described in the third paragraph of Article 16 of the Staff Regulations are those which constitute lobbying or advocacy vis-à-vis staff of the former senior manager’s former institution for their business, client or employers on matters for which they were responsible during the last 3 years in the service. Such activities shall in principle be prohibited by the Appointing Authority during the 12 months after leaving the service.

The Commission did not limit its analysis of the 32 declared activities that fell in the temporal scope of the third paragraph of Article 16 of the Staff Regulations to those whose only object or core object would have been lobbying or advocacy activities. Certain declarations concerned activities which, even if lobbying or advocacy was excluded at the point in time of the declaration, could, because of their nature, potentially give rise to, or entail, lobbying or advocacy as stated in the third paragraph of Article 16 of the Staff Regulations. In such instances, the Commission has decided to widen the analysis to take account of these possibilities and to assess the declared activity within the framework of the third paragraph of Article 16 of the Staff Regulations.

As regards activities not falling in the temporal scope of the third paragraph of Article 16 of the Staff Regulations or activities that could not (even potentially) give rise to or entail lobbying or advocacy, the Appointing Authority can, and did when appropriate impose other

restrictions such as restrictions on professional contacts with former colleagues, obligations not to deal with certain files or in relation to the duties of discretion and confidentiality. These activities do, however, not fall within the scope of the present report which is exclusively based on the reporting obligation set out in the fourth paragraph of Article 16 of the Staff Regulations.

The Commission further clarifies that the present information covers activities that have been declared and actually undertaken. In line with the legal provisions in force, it does not cover declarations received and relating to activities which could not, by their very nature, give rise to or entail such lobbying or advocacy.

The present publication represents the seventh annual information released by the Commission on the implementation of fourth paragraph of Article 16 of the Staff Regulations.

### *Number of activities concerned*

Bearing in mind that 1 declaration may refer to several activities the present information is presented by grouping the activities declared by the same former staff member, so as to provide for an exhaustive overview.

## **Analysis**

The present information covers the cases in which the Appointing Authority has taken a decision under the third paragraph of Article 16 of the Staff Regulations, in the year 2020.

The Commission did not receive any declaration of an activity taking place within the first year after leaving the service where the only or core purpose was that of lobbying or advocacy. There has thus been no corresponding decision of the Appointing Authority.

The Commission has however received declarations concerning 15 envisaged activities (by 8 former senior managers) which, even if lobbying or advocacy was excluded at the point in time of the declaration, could, because of their nature, potentially give rise to or entail, lobbying or advocacy as stated in the third paragraph of Article 16 of the Staff Regulations, in particular for situations in the future. The Appointing Authority has, therefore, deemed it advisable, as explained above, to assess these particular activities in the framework set by the third paragraph of Article 16 of the Staff Regulations. This has led the Appointing Authority to impose a prohibition of lobbying or advocacy in a conditional authorisation. In other cases falling in the temporal scope of the third paragraph of Article 16 of the Staff Regulations, the Appointing Authority reminded the former senior managers to bear in mind the rules under the third paragraph of Article 16 of the Staff Regulations in the future.

The 15 decisions regarding activities declared which have been taken in 2020, in line with the third paragraph of Article 16 of the Staff Regulations, are summarised below.

## **Summary of relevant Decisions by the Appointing Authority in 2020:**

End of Service: 30 September 2020

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### **CONCERNS**

Mr Klaus-Dieter BORCHARDT

Former Deputy Director-General at DG ENER

Former Director DG ENER

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### **NEW ACTIVITY**

Self-employed consultant on all aspects of EU Law and Policy, providing services via his company KDB.results SPRL exclusively to the law firm Baker & McKenzie.

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### **DECISION**

Mr Borchardt sought authorisation to work as self-employed consultant on all aspects of EU Law and Policy, providing services via his company KDB.results SPRL exclusively to the law firm Baker & McKenzie.

The Appointing Authority gave its approval, subject to certain conditions, to Mr Borchardt to carry out the declared activity. In addition, the Appointing Authority explicitly required him to notify the Commission when and if he intends to engage in another specific activity or group of activities. Consequently any new activity, other than the one for the law firm Baker & McKenzie, carried out within the framework of his company during the 2 years after leaving the service, must be declared and receive separate clearance.

In addition, the following conditions were imposed for this activity:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Mr Borchardt was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of his company or its clients on matters for which he was responsible during the last 3 years of service;
- During 2 years after having left the service Mr Borchardt was not allowed to engage in professional contacts, including contacts aiming notably at lobbying and advocacy with staff members of DG ENER on behalf of Baker & McKenzie or its clients;
- During 2 years after having left the service Mr Borchardt was not allowed to work on or give advice to Baker & McKenzie or its clients on all specific files and projects for which he was responsible during the last 3 years in the service;
- Mr Borchardt was required to make it clear to his interlocutors that this activity is carried out in his personal capacity, not representing in any way the position or interests of the Commission. In this context, he should refrain from associating your former position at the European Commission with his new role and tasks within Baker & McKenzie or its clients.

- Mr Borchardt was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Mr Borchardt was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain;
- It was underlined to Mr Borchardt that, under the first paragraph of Article 16 of the Staff Regulations, he continues to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits from any new employer or its clients. In this context, Mr Borchardt was required to refrain from advising or working on behalf of his new employer or its clients on particular files or matters (for example: contracts, grants, cases, claims, investigations, ongoing legislative procedures), in which he participated personally and substantially and that would entail relying upon information received in the line of duty that have not been made public.

Mr Borchardt was also reminded of all other applicable Staff Regulations provisions.

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End of Service: 5 January 2020 – on unpaid Leave on Personal Grounds since 1 June 2016

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## **CONCERNS**

Ms DRAGHIA-AKLI Ruxandra

Former Deputy Director-General DG RTD

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## **NEW ACTIVITY**

Global Head, Global Public Health Research & Development for Johnson & Johnson (J&J)

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## **DECISION**

Ms Draghia-Akli sought authorisation to work as Global Head, Global Public Health Research & Development for Johnson & Johnson (J&J).

The Appointing Authority gave its approval to Ms Draghia-Akli to carry out this activity subject to the following conditions:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Ms Draghia-Akli was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of on behalf of Johnson & Johnson for their business, clients or employers on matters for which she was responsible during the last 3 years of service;
- Ms Draghia-Akli was required not to be personally involved for a period of 24 months after leaving the service (i.e. after your formal resignation) in any assignment that would entail any relationship between the Commission and the Innovative Medicines Initiative Joint Undertaking (IMI JU);
- Ms Draghia-Akli was required to make it clear to her interlocutors that this activity is carried out in her personal capacity, not representing in any way the position or interests of the Commission.
- Ms Draghia-Akli was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Ms Draghia-Akli was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain.

Ms Draghia-Akli was also reminded of all other applicable Staff Regulations provisions.



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End of Service: 30 September 2019

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## **CONCERNS**

Mr Stefano MANSERVISI

Former Director-General DG DEVCO

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## **NEW ACTIVITIES**

Member of the scientific committee at the Foundation Real Instituto Elcano, in Madrid, for a period of 5 years, as of March 2020

External advisor at the Bill&Melinda Gates Foundation in Seattle

Advisor to the DDG for UN Specialised Agency for Education, Science and Culture (UNESCO)

Visiting Fellow for the European Council on Foreign Relations (ECFR)

Chair of the Governing Board for Global Community Engagement and Resilience Fund (GCERF)

Self-employed consultant for the Organisation for Economic Co-operation and Development (OECD)

Assistant to the Former President of the European Commission Juncker as Honorary President at Fondation “La Verticale Africa-Med-Europe” (AME)

Independent senior advisor at the European Institute for Peace.

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## **DECISION**

Mr Manservisi sought authorisation to perform the above-mentioned activities.

The Appointing Authority gave its approval to Mr Manservisi subject to the following conditions:

As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Mr Manservisi is not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of the above-mentioned entities on matters for which he was responsible during the last 3 years in the service; With specific regard to his activity as Assistant to former President Juncker at Fondation La Verticale Africa-Med-Europe, the obligation not to engage in lobbying or advocacy during 12 months after leaving the service applies not only vis-à-vis staff of the Commission but also Members of the College, in order to preserve the *effet utile* of the same obligation imposed to Former President Juncker for the same activity;

- During 2 years after the date of the retirement, Mr Manservisi shall abstain from being involved in requests or application for funding of funding allocations from DG

DEVCO by the above-mentioned entities. He shall also not try to influence DG DEVCO in any way, including through the preparation of documents;

- During 2 years after the date of the retirement, Mr Manservisi shall refrain having professional contacts, whether direct or indirect, with his former colleagues in DG DEVCO on behalf of the above-mentioned entities.
- Mr Manservisi was required also to make it clear to his interlocutors that these activities are carried out in his personal capacity, not representing in any way the position or interests of the Commission;
- Mr Manservisi was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Mr Manservisi was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain.

Mr Manservisi was also reminded of all other applicable Staff Regulations provisions.

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End of Service: 31 December 2019

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## **CONCERNS**

Ms Ann METTLER

Former Head of European Political Strategy Centre (EPSC) / Inspire, Debate, Engage and Accelerate Action (IDEA)

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## **NEW ACTIVITY**

Senior Executive Europe for Gates Ventures.

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## **DECISION**

Ms Mettler sought authorisation to act as Senior Executive Europe for Gates Ventures, in Brussels, Belgium.

The Appointing Authority gave its approval to Ms Mettler to carry out this activity subject to the following conditions:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Ms Mettler was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of Gates Ventures on matters for which she was responsible during the last 3 years in the service. This prohibition does not relate to her work on interdisciplinary research, collaborative projects and organising thought-provoking seminars and events, which is the focus of the tasks of the EPSC/IDEA. It only applies to matters where she may exceptionally have exercised responsibility for specific files, cases, decisions or legislative proposals. The prohibition to lobby does not affect general exchanges of and on publicly available information, e.g. in meetings or panel discussions;
- Ms Mettler was required also to make it clear to her interlocutors that this activity is carried out in her personal capacity, not representing in any way the position or interests of the Commission;
- Ms Mettler was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Ms Mettler was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain.

Ms Mettler was also reminded of all other applicable Staff Regulations provisions.

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End of Service: 30 June 2019

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## **CONCERNS**

Ms Margaret Megan RICHARDS

Former Director DG ENER

Former Principal Adviser DG CNECT

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## **NEW ACTIVITIES**

Advisor at FIPRA.

Advisor at Cambre Associates.

Member of the advisory council at SmartEn Association.

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## **DECISION**

Ms Richards sought authorisation to perform the above-mentioned activities.

The Appointing Authority gave its approval to Ms Richards subject to the following conditions:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Ms Richards was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of the above-mentioned entities or their clients on matters for which she was responsible during the last 3 years in the service;
- Ms Richards shall not engage, during an additional period of 12 months which follows the above-mentioned period of 12 months, in professional contacts aiming at lobbying or advocacy, vis-à-vis staff of the Commission on behalf of the above-mentioned entities, or their business or clients, on matters for which she was responsible during the last 3 years in the service.
- Ms Richards was required also to make it clear to her interlocutors that these activities are carried out in her personal capacity, not representing in any way the position or interests of the Commission;
- Ms Richards was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Ms Richards was required to refrain from exploiting insights of confidential nature in policy or strategy that she may have acquired in the line of service that have not yet been public or are not commonly available in the public domain;
- It was underlined to Ms Richards that, under the first paragraph of Article 16 of the Staff Regulations, she continues to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits from any new employer or its clients. In this context, Ms Richards was required to refrain from advising or working on behalf of the above-mentioned entities or their clients on

particular files or matters (for example: contracts, grants, cases, claims, investigations, ongoing legislative procedures), in which she participated personally and substantially and that would entail relying upon information received in the line of duty that have not been made public.

Ms Richards was also reminded of all other applicable Staff Regulations provisions.

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End of Service: 30 December 2019 – in secondment outside the institution since 1 January 2018

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## **CONCERNS**

Mr Roberto RIDOLFI

Former Director DG DEVCO

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## **NEW ACTIVITY**

President of LINK 2007

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## **DECISION**

Mr Ridolfi sought authorisation to act as unpaid President of LINK 2007, a non-profit association set up on the initiative of non-governmental organisations (NGOs) for international cooperation and solidarity.

The Appointing Authority gave its approval to Mr Ridolfi to carry out this activity subject to the following conditions:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Mr Ridolfi was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of LINK 2007, or its affiliated NGOs, on matters for which he was responsible during the last 3 years in the service;
- Mr Ridolfi shall not engage, during the 24 months after leaving the service, in professional contacts towards staff of his former DG on behalf of LINK 2007 or its affiliated NGOs;
- Mr Ridolfi during the first 2 years after leaving the service shall refrain from being in any way involved in requests for funding from programmes and projects that he had supervised as Director in DG DEVCO during the period 2017-2019. Specifically, he shall refrain from trying to influence in any way, including through the preparation of documents for LINK 2007 and/or its affiliated entities, DG DEVCO in this respect.
- Mr Ridolfi was required also to make it clear to his interlocutors that this activity is carried out in his personal capacity, not representing in any way the position or interests of the Commission;
- Mr Ridolfi was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Mr Ridolfi was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain.

Mr Ridolfi was also reminded of all other applicable Staff Regulations provisions.

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End of Service: 31 August 2019

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## **CONCERNS**

Mr Michel SERVOZ

Former Senior Adviser at European Political Strategy Centre (EPSC)

Former Director-General DG EMPL

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## **NEW ACTIVITY**

Senior Advisor for the law firm Gide Loyrette Nouel.

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## **DECISION**

Mr Servoz sought authorisation to act as Senior Advisor for the law firm Gide Loyrette Nouel, in Brussels. The activity would consist of advising clients on European rules and issues in the fields of transatlantic trade policy, digital regulation, data protection, and environmental legislation.

The Appointing Authority gave its approval to Mr Servoz to carry out this activity subject to the following conditions:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Mr Servoz was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of his business, clients or employers on matters for which he was responsible during the last 3 years in the service;
- Mr Servoz was required also to make it clear to his interlocutors that this activity is carried out in his personal capacity, not representing in any way the position or interests of the Commission;
- Mr Servoz was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Mr Servoz was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain.
- It was underlined to Mr Servoz that, under the first paragraph of Article 16 of the Staff Regulations, he continues to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits from any new employer or its clients. In this context, Mr Servoz was required to refrain from advising or working on behalf of his new employer or its clients on particular files or matters (for example: contracts, grants, cases, claims, investigations, ongoing legislative procedures), in which he participated personally and substantially and that would entail relying upon information received in the line of duty that have not been made public.

Mr Servoz was also reminded of all other applicable Staff Regulations provisions.

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End of Service: 31 July 2020

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## **CONCERNS**

Mr Rudolf STROHMEIER

Former Director-General Publications Office of the European Union

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## **NEW ACTIVITIES**

Counsellor at Cornelius, Bartenbach, Haesemann & Partners law firm.

CEO at SEUC/STROHRU EU Consulting.

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## **DECISION**

Mr Strohmeier sought authorisation to perform the above-mentioned activities.

The Appointing Authority gave its approval to Mr Strohmeier to carry out this activity subject to the following conditions:

- As a former senior manager, according to third paragraph of Article 16 of the Staff Regulations, during 12 months after leaving the service, Mr Strohmeier was not allowed to engage in lobbying or advocacy vis-à-vis staff of the Commission on behalf of the above-mentioned entities or their clients on matters for which he was responsible during the last 3 years in the service;
- during the first 24 months after leaving the service, Mr Strohmeier shall not engage in any professional contacts on behalf of the above-mentioned entities or their clients, with the Publications Office of the European Union.
- It was underlined to Mr Strohmeier that, under the first paragraph of Article 16 of the Staff Regulations, he continues to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits from any new employer or its clients. In this context, Mr Strohmeier was required to refrain from advising or working on behalf of his new employer or its clients on particular files or matters (for example: contracts, grants, cases, claims, investigations, ongoing legislative procedures), in which he participated personally and substantially and that would entail relying upon information received in the line of duty that have not been made public.
- Mr Strohmeier was furthermore required to refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public (Article 17 of the Staff Regulations). In this context, Mr Strohmeier was required to refrain from exploiting insights of confidential nature in policy or strategy that he may have acquired in the line of service that have not yet been public or are not commonly available in the public domain.
- Mr Strohmeier was required also to make it clear to his interlocutors that this activity is carried out in his personal capacity, not representing in any way the position or interests of the Commission.

Mr Strohmeier was also reminded of all other applicable Staff Regulations provisions.