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**DECISION OF THE EUROPEAN COMMISSION**

**on Former Commissioner Paolo Gentiloni's academic activities with the Catholic  
University of Milano (Università Cattolica del Sacro Cuore)**

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### **on Former Commissioner Paolo Gentiloni's academic activities with the Catholic University of Milano (Università Cattolica del Sacro Cuore)**

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,

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 scope of the exceptions set out in paragraph (3), notably as concerns academic activities (lit. (d)).

- 4) On 8 July 2025, Former Commissioner Gentiloni informed the Commission of his intention to accept two remunerated academic activities for the Catholic University of Milano (the Milano branch of the *Università Cattolica del Sacro Cuore*); first, a teaching appointment as Adjunct Professor at the Faculty of Economics, on 'Economics and institutions of the European Union', this commitment consisting of 30 hours, starting with the academic year 2025/2026; second, an appointment as president of the scientific committee of the University's think-tank 'Europe and Financial Systems', from 1 September 2025 to 30 August 2026.
- 5) With its five campuses in Milano, Rome, Brescia, Piacenza, and Cremona, the *Università Cattolica del Sacro Cuore* appears to be among the largest non-State universities in Europe, enrolling around 41,000 students and employing over 1,400 faculty members. Founded in 1921 under the auspices of the Catholic Church, this University is recognised for its strong research profile, organised across 41 departments, an institute, 72 research centres, and five university centres. Its research addresses socially relevant topics such as economics, bioethics, cultural heritage, law, family dynamics, media, political systems, medicine, mathematics, physics, and environmental studies.
- 6) The *Università Cattolica del Sacro Cuore* offers comprehensive teaching programs at undergraduate, graduate, and postgraduate levels across multiple disciplines. The university actively promotes research in fields such as economics, law, medicine, social sciences, and humanities, often collaborating with national and international institutions.
- 7) The *Università Cattolica del Sacro Cuore* promotes dialogue between science and policy to support effective European policies by organizing events and seminars in Brussels that involve representatives from EU institutions. The University participates in numerous international exchange programs, fostering global cooperation and student mobility. The *Università Cattolica del Sacro Cuore* follows closely EU policies on research, innovation, health, environment, and agri-food, collaborating with the European Parliament's Committee on Industry, Research and Energy and various Members of the European Parliament.
- 8) Within the *Università Cattolica del Sacro Cuore*, its research centre CeTIF (Centro di Ricerca in Tecnologie, Innovazione e Servizi Finanziari) works as a specialised research centre dedicated to the study of financial innovation, digital transformation, and evolving regulatory frameworks in the banking and insurance sectors. CeTIF is led by a Director and a Secretary-General, supported by a Steering Committee that includes professors and administrative representatives from the university. As part of its work, the CeTIF's think tank 'Europe and Financial Systems' leads research, analysis, and expert debate on the development of European financial markets, the adoption of technological solutions, and the strategic and regulatory challenges faced by financial institutions. The position offered to Former Commissioner Gentiloni is the chairmanship of the scientific committee of this think tank from 1 September 2025 to

30 August 2026. The terms of the invitation addressed to Former Commissioner Gentiloni underline the pure academic nature of his role as chairperson of this think tank.

- 9) The *Università Cattolica del Sacro Cuore* is primarily funded through student tuition fees, donations, and various financial aid programs. In addition, this University receives financial support from both private and public sources, including a contribution from the European Union (457 M€ from Horizon Europe and 235M€ from Horizon 2020 for the period 2014 to 2024, and more specifically 148M€ from Horizon Europe in 2024). While EU funding represents a smaller share of the overall budget, it is significant because it primarily supports research and innovation activities, as well as lifelong learning projects.
- 10) *Università Cattolica del Sacro Cuore* is listed in the EU Transparency Register and has actively participated in public consultations and contributed to various European initiatives.
- 11) The Commission noted the academic nature of Former Commissioner Gentiloni's envisaged activities for the Catholic University of Milano which do not require the consultation of the Independent Ethical Committee.
- 12) On the substance, Former Commissioner Gentiloni's teaching activity does not present any risk of incompatibility with the interests of the institution, provided he abides by all the relevant provisions of the Treaty on the Functioning of the European Union, namely Article 339, and of the Code of Conduct for the Members of the Commission, in particular the duties of collegiality and discretion with respect to the Commission's decisions and activities during his term of office, as provided for by Article 11(1) of the Code in conjunction with Article 5.
- 13) Former Commissioner Gentiloni's academic activity as president of the scientific committee of the think-tank 'Europe and Financial Systems' does not present any risk of incompatibility with his former function as Member of the European Commission or with the interests of the institution, provided he abides by all the relevant provisions of the Treaty on the Functioning of the European Union, namely Article 339, and of the Code of Conduct for the Members of the Commission, in particular the duties of collegiality and discretion with respect to the Commission's decisions and activities during his term of office, as provided for by Article 11(1) of the Code in conjunction with Article 5 and the interdiction of lobbying the Members of the Commission or their Staff, as set out in Article 11(4) of the Code.

HAS DECIDED AS FOLLOWS:

*Sole Article*

Former Commissioner Gentiloni's envisaged activities for the Catholic University of Milano (Università Cattolica del Sacro Cuore), as Adjunct Professor at the Faculty of Economics on 'Economics and institutions of the European Union' and as president of the scientific committee of the University's think-tank 'Europe and Financial Systems' are 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) of the Code in conjunction with Article 5.

Done at Brussels, on 16 July 2025.

*The President*  
*Ursula von der Leyen*