

DECLARATION ON THE HONOUR OF NO CONFLICT OF INTEREST BETWEEN THE DUTIES OF SPECIAL ADVISER TO THE COMMISSION AND OTHER ACTIVITIES

The Special Adviser :

Surname: HEITOR

First name: Manuel

Terms of reference of the Special Adviser:

Office of Commissioner:

Surname: KUBILIUS

First name: Andrius

The European Commission intends to offer Mr Manuel Heitor a contract as Special Adviser. This contract is governed by Article 5 and Articles 123 and 124¹ of the Conditions of Employment of Other Servants (CEOS) of the European Union, which lay down the rights and obligations of Special Advisers (see Annex), and by the Rules Governing Special Advisers².

Attention is drawn in particular to the obligations that **the function of Special Adviser** entails:

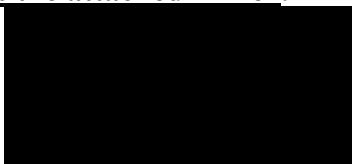
- to carry out duties impartially and objectively with due respect for the duty of loyalty and discretion with regard to the European Union, and be guided solely by the interests of the European Union;
- not to take instructions from any government, authority, organisation or person outside the Commission, in relation to the duties of Special Adviser;
- in performing the duties of Special Adviser, not to deal with any matter in which, directly or indirectly, he/she has any personal interest such as to impair his/her independence, in particular family and financial interests, and, should such a situation arise, inform the Authority Responsible for Concluding Contracts of Employment (AHCC).³ immediately in writing;
- not to accept from any government or from any other source outside the Commission any honour, decoration, favour, gift or payment in connection with duties as Special Adviser, without the permission of the AHCC.

The Special Adviser must not exploit his/her function in an inappropriate manner which could harm the image of the Commission or the Commissioner.

I, Manuel Heitor, herewith **declare that I am aware of the obligations detailed above and confirm that there is no conflict of interest between the future duties of Special Adviser and my other activities.**

Please date and sign this form as well as the attached Annex.

Date: 05 December 2025 Signature:



¹ Article 124 of the CEOS refers to Articles 11, 11a and 12 of the Staff Regulations which apply by analogy to Special Advisers.

² Rules Governing Special Advisers to the Commission adopted on 19 December 2007 (C(2007)6655) as amended by Commission Decision C(2014)541 of 6 February 2014.

³ Via Unit DG HR-E1 College, SPP & Representations