

# Annual Activity Report 2025

Office for Administration and Payment  
of Individual entitlements

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# PMO IN BRIEF

The mission of the Paymaster Office (PMO) <sup>(1)</sup> is to provide a high-quality and user-friendly service to current and former staff of the European Commission and most of the other EU institutions and agencies. PMO's services consist of:

- establishment of individual financial rights for staff, pensioners and beneficiaries;
- payment of salaries, pensions, unemployment benefits and related entitlements;
- reimbursement of health insurance, mission and expert claims;
- delivery of EU laissez-passer and handling of third-country visas for staff.

The PMO contributes to **General Objective 8** of the von der Leyen Commission: “*A modern, high-performing and sustainable European Commission*”. The PMO's expenditure is exclusively administrative in nature and is implemented under centralised direct management. The Office provides its services based on Service Level Agreements with institutions, agencies and other bodies and operates based on budgetisation (services to institutions) and chargeback mechanisms (services to agencies and other bodies).

For reasons of economy and quality of service the PMO has a specific **management and supervision structure**:

- The **Head of Service** is the authorising officer by delegation, the appointing authority for the establishment of rights and has the responsibility of producing a declaration of assurance and an Annual Activity Report;
- The activities of the PMO are supervised by the **PMO Management Committee**, chaired by the Director-General of DG Human Resources and Security.

PMO has over 600 staff members and is structured around eight units based in Brussels, Ispra and Luxembourg.

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(1) Commission Decision C(2002)4367 of 6 November 2002 establishing an Office for the administration and payment of individual entitlements

# EXECUTIVE SUMMARY

The annual activity report is a management report of the PMO Head of Service to the College of Commissioners. Annual activity reports are the main instrument of management accountability within the Commission and constitute the basis on which the College takes political responsibility for the decisions it takes as well as for the coordinating, executive and management functions it exercises, as laid down in the Treaties <sup>(2)</sup>.

## A. Key results and progress towards achieving the Commission's general objectives and PMO's specific objectives

The PMO contributes to the general objective 8 of the Commission: “A modern, high-performing and sustainable European Commission”. Two specific objectives were set to contribute to this general objective:

- Correct and timely handling of all types of transactions
- High quality standards of customer service.

### Specific objective 1: Correct and timely handling of all types of transactions

In 2025, the volume of transactions continued to increase. In this context, the PMO implemented measures to continue ensure **timely handling of various transactions** including payments related to salaries, pensions, entitlements, and unemployment benefits.

The PMO also optimised the process for the reimbursement of medical expense claims, missions, and expenses for experts and candidates, while adopting **new technologies and automation tools** to reduce errors and enhance business continuity. The PMO's Business Intelligence team analysed workflows to identify delays and bottlenecks.

By participating in the **Onboarding project**, which is part of the HR Transformation initiative, the PMO facilitated the uploading of documents needed for pre-entry into service in a single platform, thus implementing the once-only approach and leading to efficiency gains.

The PMO has also introduced an **AI-assisted feature in MyCommuting** to make claiming staff's public transport reimbursement simpler for users.

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<sup>(2)</sup> Article 17(1) of the Treaty on European Union.  
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## Specific objective 2: High quality standards of customer service

Customer satisfaction continued to be a priority for PMO throughout 2025, with efforts focusing on simplified access to healthcare, efficient IT applications, improved information, and communication.

**Access to healthcare** was facilitated through several measures:

- The transition to a digital exchange of health documents progressed through linking the sickness insurance tool ASSMAL with the Belgian MyCareNet platform
- The agreement signed with the Luxemburgish Hospital Federation, introducing an easier direct billing mechanism
- The PMO also secured a service contract to provide access to reduced-rate healthcare providers for EU Delegation staff in several countries.

**IT system improvements**, including the optimisation of the PMO Mobile application, facilitated client satisfaction. Testing groups were utilised to ensure application improvements met beneficiaries' needs.







In addition, extensive support was provided to pensioners in view of the phasing out of SMS-based multifactor authentication and its replacement by double factor identification tools for the access to PMO's IT applications.

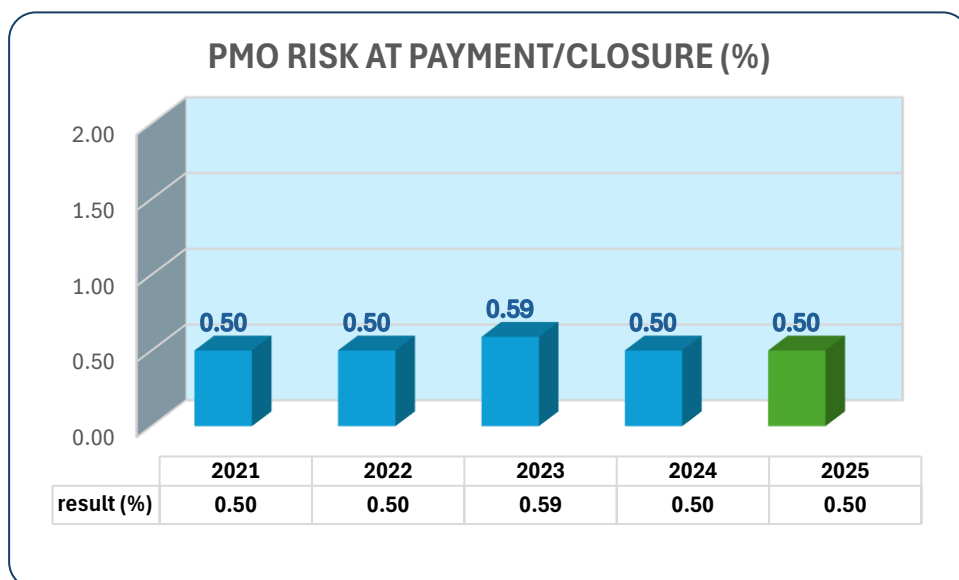
**Communication and information enhancements** included migrating intranets to SharePoint Online and transforming the Staff Matters Portal to Service Now, as part of the HR Transformation (HRT) program covering the whole "HR family". The PMO consistently provided prompt responses to customer queries via the Staff Contact platform, while replies being provided to an average of 11,430 queries per month and a decrease in average reply time to 6.3 days, maintaining an 86% positive feedback rate. Informational efforts included the launch of a Pensioners' Portal and contributions to newsletters, along with producing graphic materials and "how-to" videos for the navigation of automated systems.

Training initiatives included online sessions on financial entitlements, health insurance, the Pension Scheme, end-of-service procedures, and MIPS+ for various Commission services. Annual training on education allowance and video capsules for medical expense reimbursements was also offered.

Institutional clients received tailored communication to share internally, and the PMO Training Days combined online and in-person sessions to ensure high participation and networking opportunities.

## B. Key performance indicators

KPI #	KPI Title	Baseline (2024)	2025		Interim milestone (2027)	Target (2029)
Specific objective 8.1: Correct and timely handling of transactions						
8.1.1	Average time to handle reimbursement requests (working days)	<9	3.18		<9	<9
Specific objective 8.1: Correct and timely handling of transactions						
8.1.2	Average time to handle family allowances requests (working days)	<35	23.06		<35	<35
Specific objective 8.1: Correct and timely handling of transactions						
8.1.3	Risk at payment	<2%	0.50%		<2%	<2%
Specific objective 8.2: High quality standards of customer service						
8.2.1	Average time to answer staff & former staff members requests (working days)	<10	6.29		<10	<10
Specific objective 8.2: High quality standards of customer service						
8.2.2	Percentage of handled phone calls	80.40%	82.55%		>85%	>85%
Specific objective 8.2: High quality standards of customer service						
8.2.3	Percentage of negative feedback	1.17%	0.71%		<3%	<3%



## C. Key conclusions on internal control and financial management

The PMO has systematically examined the available control results and indicators, as well as the observations and recommendations issued by the internal auditor and the European Court of Auditors.

The transition to the Commission's new accounting system, SUMMA, on 1 January 2025 has required the adjustment to a new system and has impacted budget implementation tasks, processes and financial management activities, particularly during the first part of the year. This has required careful management to ensure the same data quality as in previous years.

All the above elements have been assessed to determine their impact on management's assurance about the achievement of the control objectives. Please refer for further details to section 2 on Internal Control and Financial Management.

In conclusion, management has reasonable assurance that, overall, suitable controls are in place and working as intended; risks are mostly being appropriately monitored and mitigated. Some improvements are needed, as minor deficiencies were identified related to data protection. The improvements envisaged include awareness raising, clarification of roles as well enhanced security in data exchanges. The Head of Service, in his capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

## D. Provision of information to the Commissioner

In the context of the regular meetings during the year between the PMO and the Commissioner on management matters, the main elements of this report and assurance declaration, have been brought to the attention of Commissioner Serafin, responsible for Budget, Anti-Fraud and Public Administration.

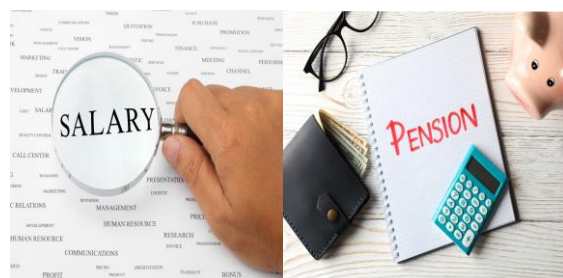
# 1. KEY RESULTS AND PROGRESS TOWARDS ACHIEVING THE COMMISSION'S GENERAL OBJECTIVES AND SPECIFIC OBJECTIVES OF THE DEPARTMENT

The PMO contributes to the Commission's general objective towards a modern, high performing European public administration by:

- ensuring at all times the correct and timely handling of all types of transactions
- offering better quality customer service.

## 1. Correct and timely handling of all types of transactions

The PMO ensures the correct and timely handling of payments of salary, pension and related entitlements as well as unemployment benefits. The PMO strives to optimise efficiency in operating the reimbursement of claims for medical expenses, missions as well as expenses incurred by experts and candidates. New intuitive dashboards allow for granular reporting and correct interpretation of the processing times.



PMO participates in the **Onboarding project** (part of the **HR Transformation initiative**), allowing the uploading of documents needed for pre-entry into service in a single platform, thus implementing the once-only approach. The pilot phase of the project launched end 2025, will transform into a full deployment in the course of 2026 bringing efficiency gains and increased user satisfaction.

The PMO significantly reduced the risk of errors associated with manual processing by using **new technologies and automation tools**. The PMO Business Intelligence team worked on mapping and analysing all workflows related to entitlements, to identify delays and bottlenecks at each step. From a general perspective, PMO's IT systems and applications ensured business continuity and adequate support to guarantee quality of service and meet business needs.

One important development concerns the reimbursement scheme of public transport tickets in Brussels, MyCommuting, which has fully replaced OIB's MobilityNet scheme in April 2025. In December 2025, the PMO has introduced an **AI-assisted feature in MyCommuting** to make claiming staff's public transport reimbursement faster and simpler. No more tedious manual entry – staff just scan their ticket or receipt, let the AI do the data entry, and validate.

## 2. High quality standards of customer service

In 2025, the PMO has taken further measures with the aim to maintain a high level of customer satisfaction. A special focus was put on simplified access to affordable health care, increased efficiency of the PMO's IT applications, as well as improved information and communication with its individual and institutional clients.



As regards the modernisation of the **Joint Sickness Insurance Scheme (JSIS)**, in 2025 there was a focus on linking up the IT tool for the sickness insurance (ASSMAL) with the Belgian IT platform (MyCareNet) for the transition to full digital transmission of e-attests by healthcare practitioners to the PMO. The integration reduces administrative burden for the affiliates, minimises the risk of document loss and late submissions, reduces the risk of

error and accelerates reimbursement processing, while ensuring secure data exchange within the Belgian eHealth ecosystem.

In 2025, the PMO signed an administrative agreement with the FHL <sup>(3)</sup>. This allows JSIS members to benefit from simplified direct billing, eliminating upfront payments and reducing administrative formalities. At the same time, the work on digitalisation of hospital invoicing and on improving cost granularity has also started.

In 2025, PMO also renewed the agreements with two Autonomous Regions of Spain, namely Galicia and Basque Countries. As a result, all PMO agreements with the Spanish regional health authorities have now been extended for another four years and will allow the JSIS beneficiaries residing permanently in those regions to have access, on a voluntary basis, to the Regional Health Services.

Last but not least, the PMO concluded a service contract with a third-party administrator to ensure access to the healthcare providers' network at reduced negotiated rates for staff (and their dependants) serving in the EU Delegations in USA, Switzerland, Thailand, China and South Africa.

Improved **efficiency of IT systems** also facilitated client satisfaction. A specific attention was given to the modernisation of existing applications and the optimisation of the PMO Mobile application (for the Missions management application MiPS, the Joint Sickness and Insurance Scheme, the management of experts' meetings in AGM and the reimbursement of public transport tickets in Brussels via MyCommuting). All improvements and modifications of applications were carefully tested with dedicated tester groups that were created with help of our active and post-active beneficiaries.



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<sup>(3)</sup> Fédération des hôpitaux luxembourgeois  
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In terms of **information and communication**, the migration of local intranets to SharePoint Online together with the transformation of the Staff Matters Portal to Service Now created



opportunities to review, reorganise and improve existing content. The PMO attaches particular attention in this process to revamping its most visited pages about JSIS, pensions and allowances to allow users to easily find answers to their questions.

The capacity of the PMO to provide quick answers to its customers' questions and requests sent via Staff Contact remains fundamental to the overall quality of its services. Through this platform, in 2025 PMO answered nearly 11,430 queries per month on average. The average time to reply to online queries decreased to 6.3 days, while the level of satisfaction from interaction with the service shows an average of 86% positive feedback.

The PMO's commitment to communicating with active and post-active staff on all matters of interest such as health insurance, pay, benefits, innovations and procedures remained high in 2025. To ensure that all staff are well-informed about corporate and local HR priorities, the PMO continued its communication efforts by sharing information on its intranet and other dissemination channels.

The Newsroom tool remained instrumental for communicating to active, as well as retired staff and unemployed while specialised websites and magazines for pensioners also distributed PMO content to their audiences. Moreover, a dedicated Pensioners' Portal was launched in 2025 to present tailor-made information relevant for retired colleagues and to facilitate their contacts with the PMO. The PMO also actively contributed to the HR Staff Matters Newsletter and continued to produce graphic material such as how-to videos on how to navigate PMO's increasingly automated systems and visual aids clarifying the main outputs.

Moreover, the PMO continued to offer online **training** sessions on financial entitlements and health insurance for newcomers, as well as on missions and MiPS+ for Commission services and new agencies adopting MiPS. In addition, monthly online training sessions were offered on end of service, transfer of pension rights and on the Pension Scheme of the European Union; annual trainings covered education allowance, while video information capsules showcased the practical steps to follow for the main actions related to reimbursement of medical expenses. PMO also continued to produce graphic material such as how-to videos on how to navigate PMO's increasingly automated systems and visual aids clarifying the main outputs.

On the side of its institutional clients, the PMO provided separately relevant information to all Institutions, agencies and other bodies, as well as to the two pensioners' associations, providing them with tailored communication to disseminate through their internal channels.

For the first time since Covid pandemic the **PMO Training Days** organised for the Institutions, agencies and other bodies served by the PMO combined online and in person sessions. This flexible concept ensured high participation and provided opportunity for networking.

## 2. INTERNAL CONTROL AND FINANCIAL MANAGEMENT

Management monitors the functioning of the internal control systems on a continuous basis and carries out an objective assessment of their efficiency and effectiveness. In annex 7, there is a list and details of the reports that have been considered. The results of the above assessment are explicitly documented and reported to the Head of Service.

### 2.1. Control results

Management uses control results to support its assurance and reach a conclusion about the cost-effectiveness of those controls, meaning whether the right balance between the following elements is achieved:

- **Effectiveness** The level of error found, based on the controls carried out.
- **Efficiency** The average time taken to inform or pay.
- **Economy** The proportionality between the costs of controls and the funds managed.

## 2.1.1. Overview of the budget and relevant control systems (RCS)

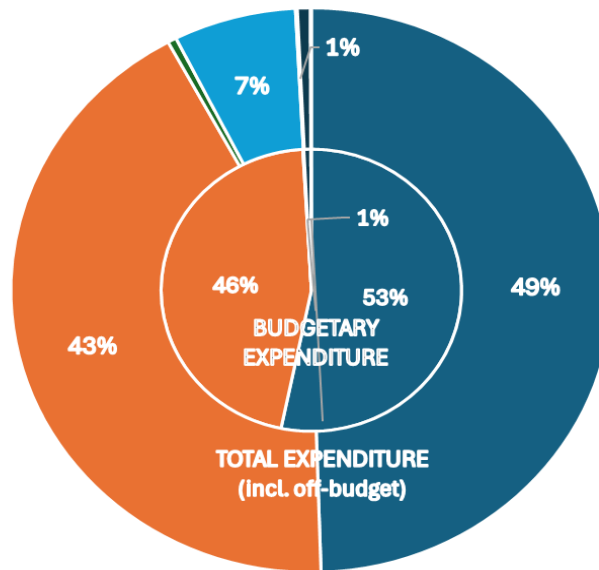
To illustrate the weight of the different operational domains and related controls, the following tables and charts show the total payments made per main type transactions, as well as the revenues collected. Payments made by the PMO on the basis of co-delegations type III (EUR 634.30 million), are not included in the chart as, since 2025, these are reported by the Authorising Officers for commitments. As per the specific rules of co-delegation of budget, the task of Authorising Officer for payments is entrusted to the PMO by other Commission DGs and Services under the form of co-delegations type III. No issues regarding these payments were observed during the year. This has been reported to the relevant Authorising Officers for commitments <sup>(4)</sup>.

PMO expenditure 2025	Expenditure budgetary (mEUR)	Expenditure incl extra budgetary (mEUR)
Salaries and other entitlements (RCS 1)	3,665.61	3,665.61
Pensions and other entitlements (RCS 1)	3,155.62	3,155.62
Unemployment allowances (RCS 1) - off-budget		34.61
Reimbursement of medical expenses - JSIS (RCS 2) - off-budget		488.34
Reimbursement of mission expenses (RCS 2)	7.47	7.47
Reimbursement of expenses relating to experts and candidates (RCS 2)	0.18	0.18
PMO operational expenditure	51.81	51.81
Other	3.59	3.59
<b>Total (excluding co-delegations type III)</b>	<b>6,884.28</b>	<b>7,407.22</b>
Co-delegation type III payments / not reported by PMO	634.30	634.30
<b>TOTAL</b>	<b>7,518.58</b>	<b>8,041.52</b>

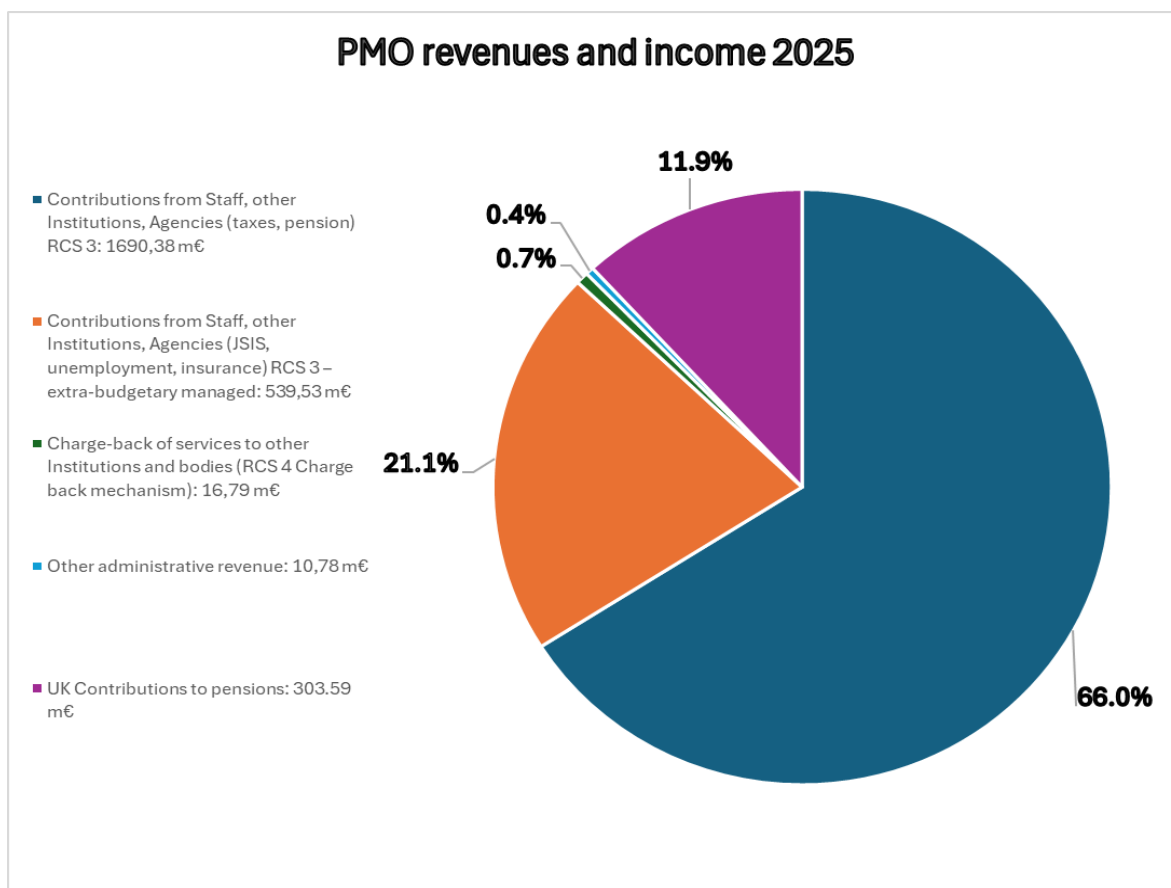
<sup>(4)</sup> Ares(2026)1921595 of 19/02/2026  
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## PMO EXPENDITURE 2025 (with and without off-budget expenditure)

- Salaries and other entitlements (RCS 1):  
3665,61 m€
- Pensions and other entitlements (RCS 1):  
3155,62 m€
- Unemployment allowances RCS 1 (off-budget):  
34,61 m€
- Reimbursement of medical expenses - Joint  
Sickness Insurance Scheme (JSIS) RCS 2 (off-  
budget): 488,34m€
- Reimbursement of mission expenses (RCS 2):  
7,47 m€
- Reimbursement of expenses relating to experts  
and candidates (RCS 2): 0,18 m€
- PMO operational expenditure: 51,81 m€
- Other: 3,59 m€



PMO revenues and income 2025	Revenues	Revenues incl extra-
	(mEUR)	budgetary (mEUR)
Contributions from Staff, other Institutions, Agencies (taxes, pension) RCS 3	1,690.38	1,690.38
Contributions from Staff, other Institutions, Agencies (JSIS, unemployment, insurance) RCS 3 – extra-budgetary		539.53
Charge-back of services to other Institutions and bodies (RCS 4 Charge back mechanism)	16.79	16.79
Other administrative revenue	10.78	10.78
UK Contributions to pensions	303.59	303.59
<b>Total</b>	<b>2,021.54</b>	<b>2,561.07</b>



The PMO's assurance building and materiality criteria stem from the correct implementation of the staff regulations and their implementing provisions regarding entitlements and reimbursement of several categories of expenditure and are outlined in annual activity report annex 5. The annual activity report annex 6 outlines the relevant control systems (RCS), namely:

[RCS1: Management \(establishment/modification & payment\) of salaries, post-activity and related entitlements](#)

[RCS2: Management \(including payment\) of medical, expert and mission claims](#)

[RCS3: Revenue Collection - Establishment and recovery of contributions](#)

[RCS4: Revenue Collection – Charge back mechanism](#)

This annex also refers to the main risks together with the control processes to mitigate them and the indicators used to measure the performance of the relevant control systems (relating to effectiveness, efficiency and economy).

The PMO's expenditure is exclusively administrative in nature and is implemented under centralised direct management. The Office provides its services based on Service Level Agreements with Institutions, agencies and other bodies and operates based on resources stemming either from direct budgetary allocations (services to EU institutions) or through invoicing (services to EU agencies and other bodies, as well as to non-EU bodies).

The PMO uses internal control processes to ensure sound management of risks relating to the legality and regularity of the underlying transactions, considering the nature of the payments concerned.

The PMO's control strategy presents the methodology and procedure of controls carried out in the PMO. The control objective is to contribute to management assurance regarding legality and regularity of operations, taking into account the three building blocks (effectiveness, efficiency and economy) of sound financial management. The PMO has set up internal control processes aimed at ensuring the adequate management of identified risk.

Since the business of the PMO is characterized by a high number of transactions, many of which are processed through mass operations, the incorporation of automated controls in the IT-applications, while duly protecting (sensitive) personal data and information, is essential. For more information on data protection see section 3.2.

According to PMO's control strategy, case handlers analyse the submitted documents considering the relevant eligibility criteria for each decision concerning entitlements or reimbursements. Same controls are applied to similar off-budget and budgetary expenditure, i.e. entitlements on the one hand and reimbursement on the other hand. Whereas for the high-risk and/or high-value transactions, each decision is verified (e.g. establishment of pension rights), a 100% ex ante verification is not possible in all domains given the very high number of (often low-value) transactions. In the latter case, controls are performed either systematically after the payment (e.g. family allowances with the possibility of systematic recovery in case of undue payments), or on a sample basis (e.g. JSIS reimbursement claims). Depending on the complexity of the claim, a more detailed analysis is carried out.

The repetitive nature of the main PMO activities allows for continuous adjustment and improvement of the control strategy. Corrective measures are taken when an error is linked to a system weakness. The results of ex-post controls are analysed and may also result in corrective measures or a detailed action plan when it is clear that further action is needed. Such further action will involve training, reallocation of files, tighter verification or focused ex-post controls as appropriate.

## 2.1.2. Effectiveness of controls

### a) Assessment of control results per segment of expenditure

#### Ex-ante controls

Organisation of ex-ante controls is based on the type of entitlement and payment (one-off, or recurrent). Recurrent payments based on the determination of eligibility to an entitlement (RCS 1) are systematically checked before the first payment. All errors are corrected, and the results of corrections influence the accuracy of future transactions. The checks are documented as part of the workflow; they are not included in the table below.

The large number of reimbursements of medical, expert and mission claims (RCS 2) on the other hand are submitted to ex-ante controls based on sampling. The results for ex-ante controls in these claims <sup>(5)</sup> show that the errors prevented through ex-ante controls remain limited, as presented in the table below. The samples taken are weighted against the total population of the respective domains. Extrapolated to the overall population, minus the population controlled and corrected, the weighted error rate avoided thanks to the ex-ante controls represents 1.30 % for this domain.

Scope ex-ante control	# files verified	Total amount verified (mEUR)	% Value Total of population covered	Weighted error rate 2025
Reimbursement of medical claims – RCS 2a	18.530	55,42	11.35%	0,53%
Reimbursement of mission and expert claims - RCS 2b	5.499	5.83	6.54 %	5.53% ***

Source : reports on ex ante controls, PMO

\*\*\* The exceptional high ex-ante error rate for the segment “reimbursement of mission and expert claims” is explained by a typographical error identified for one reimbursement claim (trimester 3/2025), which resulted in an abnormally high amount in AGM (€533820.00 vs. €533.82, the correct amount). The error was corrected before payment, therefore there was no financial impact.

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<sup>(5)</sup> Ex-ante controls include medical claims (extra-budgetary)  
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## Ex-post controls

The table below gives an overview of the results of the ex-post controls carried out for 2025:

Scope ex-post control (expenditure areas)	# files verified	Total amount verified (m EUR)	% Value Total of population covered	Weighted residual error rate 2025
Management of salaries, post-activity and related entitlements -RCS 1 <b>(budgetary expenditure only)</b>	159	3.87	0.05%	0.0046%
Management of expert and mission claims RCS 2 <b>(budgetary expenditure only)</b>	80	0.04	0.05%	0.1169%
<b>Total (weighted) – budgetary expenditure</b>	<b>239</b>	<b>3.91</b>	<b>0.05%</b>	<b>0.0060%</b>
Management of unemployment and associated entitlements - RCS 1 <b>(off-budget expenditure)</b>	48	0.15	0.44%	0.00%
Management of medical claims - RCS 2 <b>(off-budget expenditure)</b>	551	0.29	0.06%	1.66%
<b>Total (weighted) – off-budget expenditure</b>	<b>599</b>	<b>0.44</b>	<b>0.08%</b>	<b>1.55%</b>

Source: reports on ex post controls, PMO, includes budgetary and non-budgetary expenses

The samples for the ex-post controls were selected on a random basis to detect errors in the controlled files, to calculate the financial impact of these, and proceed with the necessary corrections and/or structural improvements.

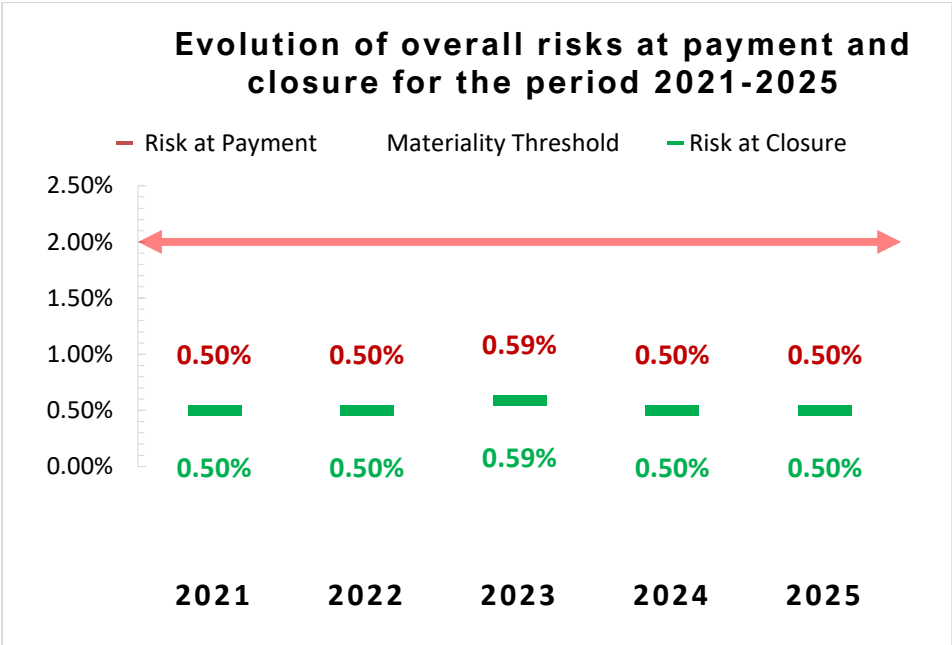
For the budgetary expenditure, as shown in the following chart, the risk at payment remained well below the materiality threshold of 2%, confirming the accuracy and quality of transactions processing by the PMO and the effectiveness of the ex-ante controls. The financial impact was low, and the corrections are usually made directly in the system through the deduction from salaries and pensions instead of recovery orders.

For the off-budget expenditure, while the management of unemployment allowances is error-free, the error rate affecting the reimbursement of medical reimbursement claims represents 1.66% for 2025 (below the materiality threshold of 2%).

For the expenditure outside the RCSs (less than 1% of total budgetary expenditure), for the reported risk at payment is 0.5%, as a conservative estimate of such low-risk types of expenditure.

Compared to the previous year, there is a stable trend in the risk at payment per RCSs. No particular difficulties were met in implementing the control strategy, the control environment remaining stable during the year. The detailed results by domain are included in the table above.

*b) Estimation of the overall risk at payment and risk at closure*



The estimated overall risk at payment for 2025 budgetary expenditure is the Authorising Officer by Delegation's best conservative estimate of the amount of relevant expenditure during the year that is not in conformity with the contractual and regulatory provisions applicable at the time the payment was made. A proportion of the underlying errors will be corrected in subsequent years and until the end of the programming cycle, corresponding to the conservatively estimated future corrections for 2025 expenditure. The difference between the risk at payment and the estimated future corrections results in the estimated overall risk at closure <sup>(6)</sup>.

There is a stable trend since 2021 ( $\leq 0.50\%$ ), with only one exception for year 2023 (when the estimated error rate was 0.59%).

For an overview at Commission level, the departments' estimated overall risk at payment, estimated future corrections and risk at closure are consolidated in the AMPR.

<sup>(6)</sup> This is the AOD's best, conservative estimation of the expenditure authorised during the year that would remain not in conformity of applicable regulatory and contractual provisions by the end of implementation of the programme.

### *c) Quantitative benefits of controls: Preventive and corrective measures*

PMO continued to perform ex-ante controls and ex-post controls, as an effective mechanism for detecting and correcting errors. In 2025, due to the transition to SUMMA, only preventive measures exceeding EUR 500,000 are reported. All corrections made by the PMO fall below this threshold and therefore are outside the reporting scope.

For 2025, there are no corrective measures, mostly because the majority of the errors are corrected following the ex-ante controls. For this reason, the corrections following ex-post controls are very limited. Considering that the expenditure of PMO is characterised by a high volume of low value transactions and the low error rate, a quantification of the benefits of controls is not meaningful. Next to the quantitative benefits, there are non-quantifiable benefits resulting from the controls implemented, namely compliance with regulatory provisions and safeguarding of financial and personal data handled, thus avoiding potential reputational risks.

### *d) Assessment of control results for non-expenditure items*

- JSIS and unemployment fund (off-budget items)

The reimbursement of medical claims in the framework of the Joint Sickness Insurance Scheme (JSIS, the health insurance scheme for staff and former staff of the EU institutions and other bodies which apply the EU staff rules) and the payment of unemployment benefits result in additional control objectives for the related JSIS fund and the Unemployment Fund (which pays unemployment allowances following end of contract to former temporary agents, contract agents and accredited parliamentary assistants). Hence, several control actions were put in place:

- an independent audit is carried out every year by an external auditor on the JSIS accounts, currently underway for the financial year 2025 with the results expected by mid-2026; no issues were reported for 2024.

- the evolution of the Unemployment Fund is carefully followed by the PMO with different services of the Commission (DG HR and DG BUDG). The fund increased by 2.22% at the end of 2025 vs. 2024 to EUR 108.62 million. The Commission reports every two years to the European Parliament and the Council on the evolution of this fund. The latest report was issued in 2024.

In conclusion, both funds are subject to follow-up controls set up by the PMO.

- Safeguarding of information and IT systems

The PMO uses the following local IT systems:

- NAP is used for the calculation of pensions, unemployment and salaries and in the production of the associated mass payments.

- ASSMAL2 is used for the calculation and controlling of the reimbursements of sickness expenses and in the production of the associated mass payments.

- MIPS is used for the calculation and control of travel costs (mission expenses) and in the production of the associated payments and reimbursements.
- AGM is used for the calculation of the payments to the experts participating in meetings and in the other costs related to meetings and in the production of the associated payments. After the phasing-out of APEX2, AGM is also integrating and managing the reimbursement of candidates.
- E-SIRE is used for the calculation and control of the payments made to seconded national experts and contractual agents and in the production of the associated payments. The system owner is DG HR, but the payment module of E-SIRE is used by PMO for controlling and validation of payments.
- Payment Factory is used to complete and send to the Accounting System all the payments produced by PMO's applications. It also provides a feature (BO and FO) for creating and managing bank accounts and legal entities as well as the link between them, to make payments possible. It also provides a real time overview of the financial situation of an agent/staff.
- PABS is used in the calculation of severances grants or transfers of pension rights.

Due to the nature of the activities carried out by the PMO, the sensitivity of personal data managed, and the increased importance attributed to privacy and security issues, there is particular interest in the management of information. The IAS carried out an audit on the protection of personal data in the PMO in 2024 (for details, see section 2.2.). To obtain sufficient assurance that all data processed is accurately and sufficiently protected, specific measures have been put in place and specific indicators are closely monitored:

- a systematic verification of all persons with access to the financial information is carried out on a yearly basis;
- in 2025 the PMO communicated 15 data breaches to the DPO of the Commission. None of these breaches were likely to result in a risk or high risk to the rights and freedoms of the data subject, so they were not notified to the European Data Protection Supervisor (EDPS).
- No leakage of sensitive information was reported in 2025.
- IT security plans are kept up to date (see section 3.2)

### *e) Fraud: prevention, detection, and correction*

The PMO has developed and implemented its own anti-fraud strategy since 2013, based on the methodology provided by OLAF. It is updated every 3 years and was last updated in 2022 (the next update ongoing and will be finalised in 2026). The PMO anti-fraud strategy is structured around three major objectives:

- Improve **communication**: An anti-fraud awareness-raising training in collaboration with OLAF took place beginning 2025. Through collaboration between all units and the legal

team as well as the Knowledge Management community, good practices are shared, and alignment is ensured.

- Increase the use of **IT tools and digital exchange of data** for fraud detection: To carry out its tasks, the PMO uses several IT applications that generate large amounts of usable data. Data analysis allows for detecting discrepancies and selecting cases where the risk of fraud is greatest for targeted and cost-effective controls.
- Ensure feedback of fraud cases to **improve processes and control**: The regular ex-post controls, as well as specific anti-fraud related checks are embedded in the internal control strategy. Close collaboration with IDOC, OLAF and EPPO allows recoveries from detected fraud cases and feedback to improve controls. The PMO Internal Control sector ascertains the appropriate treatment of all potential cases (transfer to OLAF and IDOC). Three cases were transferred in 2025. Two other cases were followed up from 2024.

Its implementation is being monitored and reported to the management, as part of the state of play on internal control. The authorising officers by sub-delegation (AOSD) report on their activities to the Head of Service with the obligation to explicitly mention any anomalies that occurred. No material issues were reported.

Corrective measures based on OLAF recommendations are reported on in the context of annual monitoring exercises conducted by OLAF, in accordance with Article 11 of Regulation 883/2013 <sup>(7)</sup>.

On the basis of the available information, PMO has reasonable assurance that the anti-fraud measures in place are effective overall

### 2.1.3. Efficiency of controls

The transition in 2025 to the Commission's new accounting system, SUMMA, has required the adjustment to a new system and has impacted budget implementation tasks, processes and financial management activities, particularly during the first part of the year. This has required careful management to ensure the same data quality as in previous years. Despite these challenges, PMO has managed to maintain the good result of the efficiency indicator on timely payments (Art 116.1 FR), remaining at 95% as in 2024 (see Annex 4).

Payment delays observed in 2025 were mainly linked to integration issues between PABS (Post Activity Beneficiary Suite, local application) and SUMMA at the beginning of the year. During this period, the timely payment of salaries and pensions was prioritized over other developments, which went well beyond the go live date for SUMMA.

The processing of school bus cost reimbursements is another cause of delays. Invoices for school buses must first be reviewed and certified as correct by the operational unit before the financial unit can process payment. Because of the very complex individual checks required at operational level, the time needed to complete them with the existing resources, and the fact

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<sup>(7)</sup> REGULATION (EU, EURATOM) No 883/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999

that, in line with the financial rules, the invoice receipt date is recorded when the invoice arrives at the operational unit, payment delays are inevitable.

The PMO is currently examining how to improve this process and reduce processing times.



The PMO ex-post control team is coordinating the ex-post control strategy and control activities within the PMO internal control sector. It aims to simplify and harmonise the methodology and results of the controls. The centralised approach provides proper implementation of operations, conformity with regulations, and increases the efficiency of controls.

In future years, there will be a further focus on automation, in addition to digitalisation, of controls, where possible, to further reduce the risk of error. Furthermore, frequency and intensity of controls will be adjusted based on the risk assessment and more targeted controls may be carried out in the light of a qualitative analysis of control results.

Reporting on the efficiency indicators required by the financial regulation: time-to-inform and time-to-grant (Art 194.2 FR) are not applicable to PMO.

### 2.1.4. Economy of controls

The PMO has analysed the costs and benefits of the two main control processes, i.e. ex-ante and ex-post controls. The cost-benefit of controls is analysed based on an estimation of the costs of control in relation to the value of the related funds managed.

The cost estimates are based on the overall cost of an official or contract agent, as estimated by the Commission. The estimated full-time equivalents (FTEs) allocated to the control-related functions are validated by line managers (heads of sectors / heads of units) for each staff member separately, based on the actual assignment of responsibilities and distribution of tasks.

In RCS 1 (salaries, post-activity and associated entitlements) an estimated EUR 3.20 million were invested in controlling financial transactions worth approximately EUR 7.37 billion. Thus 0.04% of the total value of transactions checked was dedicated to controls.

In RCS 2 (reimbursement of expert and mission claims<sup>8</sup>) an estimated EUR 0.54 million were invested in controlling financial transactions worth approximately EUR 89.12 million. Thus 0.61 % of the total value of transactions checked was dedicated to controls.

For the 2 RCSs, the total amount of payments made corresponds to EUR 6.83 billion under the budget and EUR 634.30 million under co-delegations type III.

The overall total estimated cost of control for budgetary expenses amounts to EUR 3.75 million, representing 0.05% of related expenditure. This amount includes the cost of controls for the payments made under co-delegations type III. The cost of controls for the 2 RCSs on revenues is included in the cost of controls for the payments. Overall, the result represents a stable trend compared with the previous year(s).

The overview of PMO's estimated of the cost of controls, based on the calculation of the amount in absolute values and as a ratio over the relevant funds managed, can be found in Table Y (annex 7).

## 2.1.5. Conclusion on the cost-effectiveness of controls

Based on the most relevant key indicators and control results reported above, the PMO has assessed the effectiveness, efficiency and economy of its controls of its financial management and reached a positive conclusion on the cost-effectiveness of the controls for which it is responsible.

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<sup>(8)</sup> Figures exclude extra-budgetary items  
pmo\_aar\_2025






## 2.2. Audit observations and recommendations

This section sets out briefly the state of play for all audit observations and recommendations reported by auditors related either to performance aspects or to internal control and financial management. Further details for IAS and ECA audits can be found in Annex 8.

Where an audit has detected weaknesses affecting an internal control principle or the department's assurance, a detailed analysis is provided further below in section 2.3 and, where applicable, the incidence on the AOD's assurance is presented in 2.4, accordingly.

### Internal Audit Service

Reported	Audit Title	Accepted Recommendation (critical or very important)	State of play in 2025	Impact on the assurance for 2025
2024	Protection of personal data	Very important: Recommendation 1		
		Very important: Recommendations 2,3,4		

State of play		Assurance	
	Action plan implemented or awaiting review from IAS		No impact on the assurance
	Action plan implementation is ongoing		Impact on the assurance
	Preparation of the action plan		

The IAS carried out an audit of the protection of personal data in the PMO in 2024. The PMO received the final report at the end of the year, which included four very important recommendations. These recommendations cover the following areas:

- **Accountability, Roles and Responsibilities:** the IAS concluded that the role and responsibilities in term of data protection are not well defined, that the data controllers are not sufficiently accountable, and a lack of training for PMO staff and externals.
- **Joint processing, international transfer & SLA:** the IAS found a lack of internal arrangement with other DG (delegated controllers) and requested an inventory of international transfers (with impact assessment when needed).
- **Compliance with Data protection principles:** the IAS found that several data records, privacy statements and DPIA are not updated, that too many personal information are shared with the travel agency, an unclear retention period of old personal data, and some unsecure exchange with external stakeholders.
- **IT Controls (Integrity, Confidentiality, Availability):** the IAS requested to update the IT security risk assessments and plans, to implement and monitor anonymization of data

in non-production environments, to develop a comprehensive logging and password policy, and to establish a phase-out process for old IT applications.

The PMO submitted an action plan that was accepted by the IAS. The action plan is on track and the PMO has already taken measures to limit the most significant risks.

### European Court of Auditors

Regarding the Statement of Assurance (DAS) 2024, the Court of Auditors concluded that the overall audit evidence obtained indicates that the level of error in spending on 'European public administration' was not material and no new recommendation has been issued regarding the PMO.

In the context of DAS 2025 (launched in the second half of 2025), the PMO has replied to questions and additional requests for information from the Court. At the time of issuance of this report, the final report from the Court for DAS 2025 has not been received. Currently the ECA is finalising a system audit on PMO, but the final report is not yet available.

## 2.3. Assessment of the effectiveness of internal control systems

The Commission has adopted an Internal Control Framework based on the highest international standards. <sup>(9)</sup>

The PMO has adapted the Internal Control Framework to its specific characteristics and organisational structure. The internal control systems are suited to achieving its policy and internal control objectives in accordance with the internal control principles, having due regard to the risks associated with the environment in which it operates.

In line with the Commission's Internal Control Framework, the PMO has assessed its internal control system during the reporting year and has concluded that it is effective, and the components and principles are present and functioning well overall, but some improvements are needed as minor deficiencies were identified concerning the internal control principles 11 and 13.

This overall assessment takes into consideration the reports and documentation mentioned in Annex 7, as well as the internal control survey carried out among the PMO's management and Staff in February 2026.

It also duly considers the IAS' audit recommendations on data protection, which affect principles 11 and 13, while also considering actions already taken. These include awareness raising actions, the clarification of roles in the field of data protection as well the enhanced security in data exchanges, the conclusion of administrative arrangements with other Services handling personal data on behalf of the PMO, etc. The implementation of the action plan is on track.

Moreover, the overall assessment reflects the improvements already made in 2024 and 2025 on the ex-ante and ex-post control strategy. Further improvements relate to the capacity building on procurement and contract management in operational Units.

## 2.4. Conclusions on the assurance

This section presents the conclusion on the assurance based on the assessments made in sections 2.1, 2.2 and 2.3 and whether the declaration of assurance needs to be qualified or not with reservations.

In conclusion, based on the elements reported above, management has reasonable assurance that, overall, effective controls are in place and working as intended; risks are being appropriately monitored and mitigated; and necessary improvements and reinforcements are being implemented. The Director-General, in her/his capacity as Authorising Officer by Delegation has signed the Declaration of Assurance.

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<sup>(9)</sup> The Committee of Sponsoring Organizations of the Treadway Commission Internal Control Integrated Framework, the golden standard for internal control systems.

## 2.5. Declaration of Assurance

Declaration of Assurance

*I, the undersigned, Christian Levasseur, Head of Service of the PMO*

*In my capacity as authorising officer by delegation*

*Declare that the information contained in this report gives a true and fair view <sup>(10)</sup>.*

*State that I have reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principles of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions.*

*This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, ex-post controls, the work of the Internal Audit Service and the lessons learnt from the reports of the Court of Auditors, for years prior to the year of this declaration.*

*Confirm that I am not aware of anything not reported here which could harm the interests of the institution or those of the Commission.*

*Brussels, date 20.04.2026*

*(e-signed)*

*Christian Levasseur*

*Head of Office*

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<sup>(10)</sup> True and fair in this context means a reliable, complete and correct view on the state of affairs in the DG/Executive Agency.

## 3. A MODERN AND SUSTAINABLE PUBLIC ADMINISTRATION

### 3.1. Human resource management

In 2025, the PMO continued to strengthen its commitment to inclusive human resources management, with a sustained focus on staff well-being, satisfaction, and career development. This commitment was consolidated through the launch of the PMO People Strategy 2030, which provides a long-term framework for people management aligned with the PMO's management vision and informed by staff feedback. The strategy supports efforts to enhance staff engagement and to respond effectively to the evolving needs and expectations of the workforce.

The PMO People Strategy 2030 is structured around three main axes, which guided HR actions in 2025: work environment, professional horizon, and common identity and cohesion. Activities under these axes focused on improving working conditions, supporting professional development and career opportunities, and reinforcing organisational cohesion, while preparing further actions under the rolling implementation programme.

In the area of professional development and learning, the PMO continued to promote mobility and career progression. Preparatory work was carried out for an Article 13 screening exercise, including the identification of eligible profiles and the preparation of a call to be launched in 2026. In parallel, initiatives such as staff exchange programmes and job shadowing were introduced with a good success rate. Learning and development activities were further strengthened through the organisation of a large-scale communication training programme for staff handling clients across the PMO's three sites, supporting service quality and professional skills development.

To support the integration of new colleagues, two full-day welcome sessions for newcomers were organised in 2025. In parallel, onboarding packages available in the PMO Knowledge Management Hub were further developed, with new topics added and content enriched with legal information and reusable Q&As.

In line with its commitment to equality, diversity, and inclusion, the PMO maintained gender balance in middle management in 2025. By 31 December 2025, women accounted for 50% of Heads of Unit and 57% of Heads of Sector positions. In addition, a strong representation of women was maintained in other pre-management functions, supporting the preparation of women for future leadership roles.

To ensure that staff remained well informed about corporate and local HR priorities, the PMO continued its internal communication efforts through the intranet and other dissemination channels. The visibility of career opportunities was maintained through the publication of

vacant positions on relevant platforms, complemented by the introduction of an in-house vacancy notification system.

In accordance with Commission policies, the PMO continued to apply the standard three-day telework option per week in 2025, ensuring flexibility and supporting work-life balance, while fully respecting corporate guidelines.

## 3.2. Digital transformation and data management

### Digital transformation and cybersecurity

#### Strategic Objective 1: Digital Culture

To foster a culture of digital excellence, the PMO has focused on enhancing digital skills through targeted and role-based IT training, promoting EU LEARN courses, and involving the HRC team in identifying staff training needs. The PMO will also prioritize cybersecurity awareness, with briefings, training (such as the *EU Learn – Cybersecurity for the PMO: securing sensitive data*), and awareness campaigns aimed at senior management, system owners (quarterly briefings at the PMO management meetings), and all staff (such as the Cyber roadshow that took place in MERODE in October 2025). Furthermore, the Office will promote mobile-ready EC solutions, including its dedicated mobile application, MyPMO, and encourage collaboration through digital workplace tools like Teams and M365.

#### Strategic Objective 2: Digital-Ready EU policymaking

The PMO's IT strategy has aimed to replace traditional electronic and paper documents with enhanced data exchange and interoperability capabilities, streamlining communication with customers and EU Member States. To achieve this, the PMO has worked closely with DG EMPL, DG CNECT, DG HR, DG DIGIT and several administrations to assess the feasibility of utilizing existing platforms such as EESSI <sup>(11)</sup>, EUDIW <sup>(12)</sup>, or integrating with various National Healthcare Systems (e.g. Belgium's MyCareNet). In this context, the PMO has carefully evaluated both legal and technical factors and has launched several initiatives: a workshop in February 2025, one pilot for EUDIW with JSIS certificates for the hospitals in Luxembourg and the rollout in full production of MyCarenet for JSIS affiliates and beneficiaries in Belgium.

#### Strategic Objective 3: Business-driven Digital Transformation

In 2025, the PMO continued to implement the strategic objectives for the most important IT systems in line with the [Commission Digital Strategy](#) and to develop solutions for the Digital Transformation Plan .

- **Payroll (NAP):** In 2025, the main activities foreseen in the domain covered Summa hyper care and integration, the pay control module (ACP) implementation, onboarding in payroll system of DG ECHO's experts' population and the new Luxembourg housing allowance.

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<sup>(11)</sup> [Electronic Exchange of Social Security Information \(EESSI\) - European Commission](#)

<sup>(12)</sup> [EU Digital Identity Wallet Home - EU Digital Identity Wallet - pmo\\_aar\\_2025](#)

Finally, and according to the HRT plan, PMO prepared the project aiming in payroll modernisation, once the new framework contract with the service provider Sopra was signed end of December.

- **Finances Management** (Payment Factory / PF): The challenge of the SUMMA integration continued in 2025, focusing on the integration of PF with SUMMA for agencies. and preparing the migration of JSIS ABAC AM71 to SUMMA CARE. Following phases of Debt Management were evaluated in 2025 for travel management.
- **Rights and Allowances Management** In the context of managing rights for active and former staff, a task force has been established to tackle the backlog of on-going declarations of dependent child allowances received from other sources (PPA) by active staff, bringing the volume from around 7000 to 1200. In addition, in 2025, a new Luxembourg housing allowance was introduced to address high housing cost in Luxembourg. PMO has designed a new control system for this allocation aimed at automatization and user-friendliness. The onboarding process of newcomers/staff changing institutions was fundamentally revisited in 2025 with the use of the new Onboarding Tool being part of the larger HRT initiative.
- **Travel Management - (MiPS+)**: The main focus in 2025 was given to: SUMMA post roll out hyper-care and enhancements, integration of Risk assessment Issues, New mission guide, Travel Agency integration, Integration of automatic payments, and Hotel management integration.
- **Experts' meetings and reimbursements management** (AGM): In 2025, SUMMA integration to improve Business Partners (BP) management and payments management, impacted heavily operations during first semester but they resume on a normal peace after summer break.
- **Commuting management** - following a transformation project, the PMO has taken over the management of commuting expense reimbursements from OIB in 2025. Under the greening policy, this management includes the reimbursement for various public transport options. An expansion of reimbursements to include expenses related to bicycle usage is envisaged in 2026, as well as the opening to further EU sites.

#### Strategic Objective 4: Seamless Digital Environment

To achieve a seamless digital environment, the PMO has focussed on improving its digital landscape by replacing, transforming, and migrating IT systems to embed newer technologies and capabilities. In addition, it has prioritised reusing existing business-agnostic IT solutions, with more digital sovereign corporate Reusable Solutions (EU SIGN, EU SEND, EU LOGIN MFA, Kafka, CNS, eTranslation, eUI) and fostering the reusability and interoperability of its IT systems. The PMO is implemented an enhanced User Experience for all types of populations served, especially those more vulnerable population such as pensioners with the launch of a full User Experience study for MyPMO. Additionally, it has promoted cloud adoption whenever possible, conducting an analysis of current IT systems that could potentially move to the cloud and developing an action plan for their migration.

In this context, PMO has continued with the implementation of key **IT projects** launched with the approval of the IT Cybersecurity Board (ITCB):

- **PMO Single phone number:** In 2025, a new project phase addressed the technology obsolescence of DIGIT.C's AnyWhere365-based call centre by seamlessly integrating the Brussels, Luxembourg, and Ispra PMO sites, consolidating a unified phone number structure.
- **PMO within HR Transformation:** PMO's digital transformation is partially incorporated within the HR Transformation (HRT) Programme. The HR Service Desk project, evolving from the Staff Matters Portal and Staff Contact, continues to enhance user engagement through a phased rollout featuring appointment management, and the improvement of the knowledge articles and simplified, interinstitutional back-office interface.
- **MyPMO mobile application:** PMO's mobile solution provides end users a single access to a set of consolidated services, features, and functions available in multiple PMO systems. MyPMO has expanded to offer more functionalities for managing of travel expenses, health insurance, entitlements, meetings and commuting (the latter including the use of AI to make the reimbursements easier to the users of public transport in Belgium).
- **JSIS - NHS programme:** The programme focuses on integrating and enabling data exchange between JSIS and the EU National Healthcare Systems (NHS). The PMO has secured approval from the EC DPO and launched a pilot with a selected group of users in Belgium early 2025. Later in the year, the project has been opened to all populations and has expanded to cover additional use cases in Belgium (such as dentists), while further agreements with Luxembourg, and Poland will be explored. Worth to mention the agreement with the Luxembourgish Hospital Federation (FHL) to simplify the procedure of direct billing with hospitals in Luxembourg.
- **Artificial Intelligence innovations:** PMO's objective in 2025 has been to industrialize proof of concepts by launching fully-fledged projects that comply with the AI Act as well as with strict data protection and cybersecurity guidelines, focusing on initiatives such as Intelligent Document Processing to enhance efficiency and productivity through AI-driven tools, and AI-powered Digital Assistants that include an AI Information Assistant—DORIA—to help staff quickly locate relevant information, and Self-Serve Data Requests—DataBot—to facilitate rapid and intuitive data retrieval using hybrid AI and natural language processing.
- **Digital Identity wallet:** In the coming years, the identity wallet is expected to transform customer interactions with administrative services by providing secure digital credentials and standardized electronic authentication across Europe. The PMO is already exploring this solution and prepare for adoption by 2027, focusing on two key initiatives: developing JSIS certificates for Luxembourg hospitals and exploring EU wallet use cases with support from DG CNECT and DIGIT.

In addition, PMO is committed to further simplify and rationalize the existing Digital Landscape, in line with the Corporate Digital Strategy. In this context, the newly created Business Architecture Office will act as a key enabler for linking strategy execution with transformation, ensuring:

- That PMO processes and business applications align with strategic business priorities

- The adoption of corporate reusable components (e.g. EU Sign) and alignment with the Corporate Reference Architecture
- The identification of building blocks which could be deployed across business domains.

## Strategic Objective 5: Green, secure and resilient infrastructure

Currently, 6% of PMO IT systems operate on cloud infrastructure. PMO is aware of the importance of promoting secure deployment of new cloud workloads and ensuring continuous improvement of the security posture of existing cloud deployments. To achieve this, the PMO will promote and monitor the use of the new European Commission Cloud Security Controls Baseline (CSCB), as well as the principles and rules on outsourcing of Cloud Infrastructure Services (CIS), the European Commission Managed Landing Zone, and the recommendations of the Cloud Council.

With regards to **IT security**, all the IT systems of the PMO's portfolio have EU Login with multi-factor implemented, including for the access to the applications within the EU institutions' network. PMO is committed to promoting a strong **cybersecurity** culture within the organization, building on its past efforts, which have included numerous events in this field, such as the Cybersecurity Roadshow. In 2025, the PMO ensured staff engagement through annual knowledge assessments, online training, and active reporting of suspicious emails.

By prioritizing these initiatives, the PMO demonstrates its dedication to implementing the European Commission's Cybersecurity Strategy for 2025-2026, with the goal of fostering a secure working environment. This effort aligns with the primary responsibilities assigned to the Directorates-General (DGs) and Local Information Security Officers (LISOs).

Following the migration to Welcome domain of all PMO devices, a continuous monitoring and auditing of the access rights under the supervision of the internal control team continued in 2025.

## Data management

Data is a crucial asset for the PMO and plays a fundamental role in the execution of its mandate. In previous years the PMO has undertaken significant efforts to improve its data maturity posture, achieving a 'Developing' data maturity level in the four areas of interest related to data: Data Management, Data ownership and responsibilities, Data Quality & FAIRness and Data Skills.

*Data Management, Data ownership and responsibilities:* The PMO works in close cooperation with the other members of the HR Family in the domain of Data Management, notably in the context of the HRT Digital Transformation programme. Steps towards a closer integration and alignment took place in the current waves 1 and 2 and will continue in the upcoming waves of the programme, including common Data Governance practices, a common Data Catalogue and a common Data Platform which is currently in the initial design phase.

Given the key financial impact for PMO, with the arrival of SUMMA in 2025, more synergies with DG BUDG have been launched in the data governance area. This is starting to yield

benefits by having a cross-cutting and end-to-end overview of all financial data impacting PMO's business.

*Data Quality & FAIRness:* In addition to the actions taken in the context of the HRT programme a key initiative in this area has been the launch of data quality dashboards providing a horizontal view across IT systems and business domains. These provide business units with a user-centric view of key data assets and provide actionable metrics on Data Quality and FAIRness.

*Data Skills:* PMO started to promote the upskilling of staff through both external and internal trainings, also in the context of the use of Artificial Intelligence. Hands-on trainings on the use of available data products (e.g. domain-specific dashboards, chargeback dashboards, operational dashboards) were organised with several PMO units.

Because of the particular nature of the mandate of the PMO, for the moment no relevant data assets to be published at the data.europa.eu portal have been identified.

## Data protection

Regarding data protection, the PMO continues to implement the action plan adopted in response to the IAS audit report on PMO's personal data protection adopted in 2024. To this aim, PMO put in place a management structure for managing data protection that provides strong leadership and oversight, clear reporting lines and responsibilities. Clear reporting lines for data protection have been established within the PMO through the adoption of specific guidelines, targeted awareness-raising activities, including presentations and discussions in management meetings, as well as dedicated training sessions for PMO staff members. The PMO continues to fulfil its obligations as separate controller when processing personal data in the context of the Service Level Agreements concluded with Union institutions, bodies, offices and agencies.

As regards the exchanges of data between the Commission and the Member States, the PMO will closely assess the impact of envisaged data processing operations for data subjects and ensure transparency by carrying out a data protection impact assessment (DPIA) where the conditions of article 39 of Regulation are met as well as systematically including a data protection annex to reinforce transparency toward data subjects. With regard to agreements with national authorities, data protection aspects have been comprehensively addressed. Data protection provisions have been incorporated into the agreements, complemented by a dedicated data protection annex detailing the roles and responsibilities of both parties. Consent forms for data subjects have been established, tailored privacy statements prepared, and records of processing operations updated accordingly.

The PMO has updated its procedures to ensure appropriate follow up of data breaches. It has taken an approach of full transparency, so that all data incidents are notified to the DPO, even cases that were unlikely to present a risk for the data subject. In 2025, the PMO systematically integrated data protection concerns in the risk assessment, as well as in the internal control standard monitoring exercises. In the event of a data protection incident, the PMO used data breach reports to enhance internal controls in close cooperation with the relevant operational controllers.

In 2025, a substantial effort was made to strengthen training and awareness-raising on data protection. More than 10 training sessions - both general and targeted- were delivered to reinforce staff awareness of data protection obligations, and data protection has been incorporated into the onboarding programme for all new colleagues joining the PMO. In addition, the DPO was invited to a management meeting to raise data protection issues at the level of Heads of Unit and to promote consistent leadership engagement across the PMO

Also in 2025, a set of guidelines and procedures on data protection topics of particular importance for the PMO was established to ensure that all staff members are fully aware of the data protection requirements relevant to their role (data breaches, data subject rights, guidance to all actors etc.).

As regards data protection record management, all the records of processing operations that were not revised for more than 2 years between their last publication or which involved changes in the management process have been revised (approx. 11 records). A French and English version of the privacy statements have been established for all records. A dedicated webpage on the PMO Intranet groups all its privacy statements, making them accessible and accurate. Concerning the data protection by design and by default obligation, regular meetings are held by the data protection coordinator of the PMO with the IT unit to ensure that data protection is embedded in the design of information systems and processes. PMO DPC participates to all SuperChab meetings.

PMO updated its confidentiality declarations for its staff and staff of other DGs that may need to access to its IT applications. The PMO requested OIB staff member in charge of putting into envelopes PMO's documents to sign specific confidentiality declarations.

As regards international transfers, the PMO continues its reflection internally and with other services of the Commission, to find alternative solutions for future projects that involve clouds or that ensure that these transfers lawful in compliance with Chapter V of Regulation (EU) 2018/1725 and the case law.

The PMO will continue its collaboration with the DPOs of other EUIs or other DPCs of other services of the Commission via meetings on specific topics. In addition, the DPC participates in several working groups with the network of DPCs.

## Knowledge and document management

To support the PMO's staff in their efforts to deliver quality services in the context of a steady increase of transactions, the PMO [knowledge management \(KM\)](#) system encompasses a common knowledge base of procedures and related content, supported by a powerful Search+ function. The system now features thematic onboarding packages tailored to each domain and sub-domain, allowing newcomers to acquire essential knowledge in a structured, centralised manner and become quickly operational. In 2025, the Knowledge Management (KM) team and KM correspondents across the PMO collaborated and trained to further complete the PMO Knowledge Hub — a structured knowledge base. Moreover, the legal consolidation project began to compile and make accessible the relevant legal knowledge which the operational teams in the PMO may need to assess cases and make AIPN decisions.

As regards [Document Management](#), progress was made with the revision of the PMO filing plan and re-design of integration of PMO information systems with Hermes-Ares-NomCom (HAN) via the Hermes Repository Services (HRS). Improvement of such integration boosted process efficiency by automatic registration and filing of records. Moreover, a PMO Specific Retention List (SRL) was revised and approved by the management.

Finally, the KM community continued in-house knowledge sharing sessions for PMO staff on various topics of common interest (Knowledge Exchange Hour).

### 3.3. Sound environmental management

The Corporate EU Eco-Management and Audit Scheme (EMAS) policy is implemented by the PMO. Next to the initiatives managed at central level, local actions in the PMO sites are set up for promoting an [environmental-friendly working place](#) and making better use of natural resources, in line with the Communication of the Greening the Commission whereby the Commission's ambition is to become climate neutral by 2030.

The current set-up of PMO's building in Brussels as a collaborative space facilitates sustainable ways of working and energy efficiency. The high rate of teleworking coupled with growing use of [paperless processes](#), collaborative tools and video conferencing reduces PMO's environmental footprint.

Taking advantage of existing capabilities in the applications and platforms used, the PMO uses [paperless workflows](#) for the majority of its procedures. Declarations and exchange of information with PMO's clients are mainly processed through online tools.

Under the umbrella of the Digital Communication Programme, in 2025 the PMO continued to map and analyse remaining paper circuits and possibilities for digitalisation in order to further reduce paper consumption and improve "paperless" exchanges with DG HR – to the extent possible, given the vulnerable populations it also serves.

In the area of healthcare, an electronic platform for direct billing with the Belgian healthcare practitioners, as well as with Luxemburgish hospitals was put in place and was extended in 2025, aiming to decrease the environmental footprint, by reducing the paperwork and simplifying the workflows.

PMO contributes towards raising awareness on the [ecological impact of missions](#) by measuring the impact of each mission and suggest options to limit the impact to various actors. The baseline (in 2019) for the staff travel emissions in PMO is 68 t CO2 eq. In 2025, the result was 24 t CO2 eq, PMO achieving a 65% reduction, which is above the corporate target of reduction by 50% until 2030. The achievement of this reduction was possible thanks to the actions implemented by the PMO such as minimization of business flights; promotion of direct flights; preference for car-sharing and low-emission vehicles; preference for train for short and medium journeys; limitation of the number of persons at the same place of mission, etc.

PMO is following up on the developments in the field of [Green public procurement](#) and adapting its procedures to the new features where applicable.

The [EMAS campaigns](#) mainly focused in 2025 on staff awareness on greener ways of working, waste reduction and energy saving. Local actions are supported by regular publication of tips and tricks on the dedicated PMO EMAS Intranet page. PMO encourages its staff to become EU Climate ambassadors.