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DECISION OF THE EUROPEAN COMMISSION

**on Former High Representative/Vice-President Josep Borrell's post term of office
professional activity as member of the Advisory Board of the PRISA Group**

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THE EUROPEAN COMMISSION,

Having regard to the Treaty on European Union,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to the Treaty establishing the European Atomic Energy Community,

Having regard to the Commission Decision of 31 January 2018 (C(2018) 700 final) on a Code of Conduct for the Members of the European Commission, and in particular Article 11(3) thereof,

Considering that:

Whereas:

- 1) According to the second paragraph of Article 245 of the Treaty on the Functioning of the European Union, the Members of the Commission, when entering upon their duties, shall give a solemn undertaking that, both during and after their term of office, they will respect the obligations arising therefrom and, in particular, their duty to behave with integrity and discretion as regards the acceptance, after they have ceased to hold office, of certain appointments or benefits.
- 2) Article 339 of the Treaty on the Functioning of the European Union provides that the Members of the institutions of the Union shall be required, even after their duties have ceased, not to disclose information of any kind covered by the obligation of professional secrecy, in particular information about undertakings, their business relations or their cost components.
- 3) Article 11 of the Code of Conduct for the Members of the European Commission establishes a specific procedure for the assessment of planned professional activities which the Members or former Members of the Commission intend to take up after they have ceased to hold office. The Commission shall examine the information provided in order to determine whether the nature of the planned activity is compatible with Article 245 of the Treaty on the Functioning of the European Union. If the planned activity is related to the portfolio of the Member or former Member, the Commission shall decide only after having consulted the Independent Ethical Committee unless the planned activity falls within the exceptions foreseen in paragraph 3, second subparagraph, lit. (a) to (f).

- 4) On 19 December 2024, Former High Representative/Vice-President Borrell informed the Commission about his intention to accept a remunerated assignment, for one year, as member of the Advisory Board of the PRISA Group, to hold, in 2025⁽¹⁾, the conference “World In Progress Barcelona” (WIP) which will take place in Barcelona.
- 5) Former High Representative/Vice-President Borrell informed that the WIP Conference aims at responding to the growing demand for spaces for dialogue and reflection on the great challenges and opportunities facing our world. It is global in scope (not limited to Spain or Europe) and includes perspectives from Latin America, the United States, Asia and Africa. The WIP Conference is attended by leading politicians and intellectuals, who reflect on the future of geopolitics, industry and climate change from a non-partisan approach. Former High Representative/Vice-President Borrell added that the WIP Conference had already been organised (for the first time) in October 2024 and had been inaugurated by HM the King of Spain.
- 6) Former High Representative/Vice-President Borrell added that his intended activity, consisting of advising in the context of the organization of the Conference, will be focused on the main subjects to be dealt with in order to reflect their geopolitical relevance.
- 7) Former High Representative/Vice-President Borrell underlined that the WIP Conference is financed by private PRISA (*Promotora de Informaciones, S. A.*), notably editor of the Spanish newspaper *El Pais*, with the support of the Barcelona Town Hall.
- 8) Former High Representative/Vice-President Borrell underlined that his activity such as described above is not accompanied by any other activity for the PRISA Group.
- 9) In view of the thematic nature of the WIP Conference, the notified activity is linked to Former High Representative/Vice-President Borrell’s previous responsibilities for Foreign Affairs and Security Policy. The Independent Ethical Committee was therefore requested, on 14 January 2025, to deliver its opinion on the compatibility of the notified activity with Article 245 of the Treaty on the Functioning of the European Union.
- 10) The Committee delivered its opinion on 21 March 2025. The Committee first established the relevant facts regarding the nature of Former High Representative/Vice-President Borrell’s envisaged activity, taking into account its close link with the PRISA Group. The Committee then assessed the legal context applicable and drew its conclusions on the compatibility of the envisaged activity vis-à-vis the legal context.
- 11) The Committee underlined that Former High Representative/Vice-President Borrell’s activity for the PRISA Group, as member of its Advisory Board, will be limited to the organisation of the WIP Barcelona Conference, in 2025, without involving anything

(¹) On 14 and 15 October 2025, according to open sources [AGENDA - WIP](#)

beyond this role. The Committee has not found publicly available information detailing the role of PRISA Group in the organisation of the conference.

- 12) As concerns the PRISA Group, the Committee noted that this Group is a global media and education business group present in 22 countries and headquartered in Madrid, active in the creation and distribution of education, news and entertainment content across Spanish-speaking markets. PRISA's flagship publication, *El País*, is Spain's leading daily newspaper, which has a significant international presence, particularly in Latin America.
- 13) The Committee acknowledged Former High Representative/Vice-President Borrell's information regarding the nature of the VIP Conference and noted that, in addition to PRISA's financial involvement, this conference is also sponsored by private entities (namely *Telefónica*, *Fundación La Caixa*, *Iberia*, *Indra*, *Naturgy* and *Foment del Treball Nacional*) as well as the City Council of Barcelona.
- 14) The Committee underlined that PRISA Group is not listed in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission.
- 15) The Committee then recalled the legal framework applicable to the assessment of the post term of office activities of former Members of the Commission and eventually concluded on the restrictions and conditions deemed necessary in order to ensure the compatibility of Former High Representative/Vice-President Borrell's envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.
- 16) As a preliminary consideration, the Committee noted that former Members of the Commission have a right to engage in work and to pursue a freely chosen or accepted occupation after the term of their office. This right needs to be balanced with the obligations set out in Article 245 TFEU and the Code of Conduct for the Members of the European Commission, which develops these obligations in more detail.
- 17) The Committee noted that the international dimension of the WIP Conference creates a strong link with Former High Representative/Vice-President Borrell's portfolio, underlining nevertheless that Former High Representative/Vice-President Borrell's envisaged task is advisory and limited to providing input for the topics and organisation of the conference. More precisely, Former High Representative/Vice-President Borrell's role does not involve any lobbying or responsibilities in securing funding on behalf of PRISA Group. The Committee furthermore noted that the conference aims at discussing topics of general interest and international relevance. The Committee concluded that Former High Representative/Vice-President Borrell's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union and that it is compatible with Article 245 TFEU.
- 18) The Committee suggested nevertheless that the Commission recalls that Former High Representative/Vice-President Borrell remains bound by Article 11(4) of the Code of

Conduct, laying down the obligation to refrain from lobbying Members or staff of the European Commission on behalf of PRISA Group, on matters for which he was responsible within his portfolio for a period of two years after ceasing to hold office. This does not affect a participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.

- 19) Given the fact that the envisaged activity is related to Former High Representative/Vice-President Borrell's portfolio, the Committee also suggested that the Commission decision recalls the confidentiality obligation laid down in Article 339 of the Treaty on the Functioning of the European Union, as well as the general obligations set out in Article 11(1) of the Code, in conjunction with Article 5 regarding the duties of integrity, discretion and collegiality.
- 20) The Committee finally considered that the Commission should also recall that, according to Article 13(2) of the Code of Conduct, former Members of the Commission shall inform the President in a timely manner if they have doubts with regard to the application of this Code before acting on the matter relating to which the doubts arise.
- 21) The Commission has considered the Committee's opinion and shares its conclusions.

HAS DECIDED AS FOLLOWS:

Article 1

Former High Representative/Vice-President Borrell's envisaged post term of office professional activity as member of the Advisory Board of the PRISA Group, in charge of organising the Conference "World in Progress", to be held in Barcelona in 2025, is compatible with Article 245 of the Treaty on the Functioning of the European Union, subject to the respect of the conditions and restrictions set out in Article 2.

Article 2

- 1) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former High Representative/Vice-President Borrell shall refrain from disclosing or using information of the kind covered by the obligation of professional secrecy that he obtained as Member of the Commission, in particular information about undertakings, their business relations or their cost components;
- 2) In line with Article 11(1) of the Code of Conduct for the Members of the Commission, in conjunction with Article 5 of the Code, Former High Representative/Vice-President Borrell remains bound by the duties of collegiality and discretion, with respect to the Commission's decisions and activities during his term of office. He shall not disclose what was said at meetings of the Commission and shall apply a high sense of discretion with regard to the use of information and insights that he obtained during

his mandate in relation to the performance of his portfolio obligations and, in general, in relation to his duties as Member of the Commission;

- 3) Former High Representative/Vice-President Borrell shall refrain from lobbying the Commission on behalf of PRISA on matters for which he was responsible within his former Commission portfolio, during the one-year period of his assignment with PRISA. This does not affect a possible participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.
- 4) In line with Article 13(2) of the Code of Conduct for the Members of the Commission, Former High Representative/Vice-President Borrell shall inform the President of the Commission, in a timely manner, if and when he has a doubt with regard to the application of the present Decision or the Code of Conduct in general before acting on the matter in relation to which the doubt arises.

Done at Strasbourg, on 1 April 2025.

The President
Ursula von der Leyen