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**ANNUAL REPORT ON THE APPLICATION
OF THE CODE OF CONDUCT FOR THE MEMBERS OF THE EUROPEAN COMMISSION IN
2024**

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INTRODUCTION

The Treaties, in particular Article 17(3) of the Treaty on European Union¹ and Article 245 of the Treaty on the Functioning of the European Union², lay down the essential ethical principles that govern the conduct of Members of the Commission. The Code of Conduct for the Members of the European Commission defines and clarifies these principles and sets out how they should be applied in practice.

The Code of Conduct for the Members of the Commission³, adopted on 31 January 2018, forms part of the governance arrangements of the Commission which ‘ensure that the Commission functions as a modern, accountable and performance-oriented institution’⁴. Moreover, the importance of ethical conduct and of abiding by the Code of Conduct is also emphasised in the Rules of Procedure of the Commission of 4 December 2024⁵ and in the new Working Methods of the European Commission⁶.

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- ¹ ‘The Commission’s term of office shall be five years.
The members of the Commission shall be chosen on the ground of their general competence and European commitment from persons whose independence is beyond doubt.
In carrying out its responsibilities, the Commission shall be completely independent. Without prejudice to Article 18(2), the members of the Commission shall neither seek nor take instructions from any Government or other institution, body, office or entity. They shall refrain from any action incompatible with their duties or the performance of their tasks.’
- ² ‘The Members of the Commission shall refrain from any action incompatible with their duties. Member States shall respect their independence and shall not seek to influence them in the performance of their tasks. The Members of the Commission may not, during their term of office, engage in any other occupation, whether gainful or not. When entering upon their duties they 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. In the event of any breach of these obligations, the Court of Justice may, on application by the Council acting by a simple majority or the Commission, rule that the Member concerned be, according to the circumstances, either compulsorily retired in accordance with Article 247 or deprived of his right to a pension or other benefits in its stead.’
- ³ Official Journal C 65 of 21.02.2018, page 7:
<http://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=OJ:C:2018:065:TOC>
- ⁴ See the Communication to the Commission ‘Governance in the European Commission’, C(2020) 4240 final, 24.6.2020,
https://commission.europa.eu/document/download/5faa3c57-4ec3-4b50-8e3e3688ee394aed_en?filename=c_2020_4240_en.pdf
- ⁵ C(2024) 10000 final.
- ⁶ For the Commission that took office on 1 December 2024, see Communication from the President to the Commission: ‘The Working Methods of the European Commission’, P(2024) 5, [4b958a25-a16a-4ac2-bda8-c14a18bd117c_en](https://commission.europa.eu/document/download/4b958a25-a16a-4ac2-bda8-c14a18bd117c_en); for the Commission in office until 30 November 2024, see Communication of the President to the Commission: ‘The Working Methods of the European Commission’, P(2019) 2, 1.12.2019, [0dbda7ed-b7fb-4d7e-9e62-6c8b0f54be62_en](https://commission.europa.eu/document/download/0dbda7ed-b7fb-4d7e-9e62-6c8b0f54be62_en)

Article 13(4) of the Code provides that the Commission should publish annually a report on the application of the Code. This is the seventh annual report on the application of the new Code, covering 2024⁷.

2024 was a year of transition between the two Commission mandates. The Code helped ensure that high ethical standards expected from the Members of the European Commission were applied at all stages, for example as concerns the participation in the European election campaign, the declarations of interest of incoming Members, the assessment of post mandate activities envisaged by outgoing Members of the Commission. 2024 was also marked by the conclusion of an agreement between eight institutions and advisory bodies establishing an interinstitutional EU Ethics Body in order to develop common ethical minimum standards for the members of all institutions.

1. INTERINSTITUTIONAL ETHICS BODY

In 2024, significant developments marked the establishment and operationalisation of the new EU Ethics Body, an initiative launched by the European Commission to enhance ethical oversight across EU institutions. The Commission first laid the groundwork with a proposal adopted on 8 June 2023, initiating a collaborative effort with the institutions and advisory bodies outlined in Article 13 of the Treaty on European Union (TEU). Vice-President Věra Jourová subsequently led six high-level political meetings to advance negotiations with representatives of these institutions, held on 7 July, 8 November, and 7 December 2023, followed by three more sessions on 30 January, 23 February, and 12 March 2024.

On 27 March 2024, the Commission formally endorsed a provisional agreement, which was subsequently approved by all relevant parties on 17 April 2024. Following internal ratifications by each party, a signing ceremony took place on 15 May 2024, marking the formal conclusion of the agreement. The Official Journal published the agreement on 17 May 2024, which entered into force on 6 June 2024⁸.

Upon its establishment, all parties to the agreement appointed both members and substitute members to the EU Ethics Body, with administrative staff designated to the Body's secretariat. Additionally, discussions commenced on appointing five independent experts to the Body. A Memorandum of Understanding (MoU), signed at the level of Secretaries-General, further outlined the Body's operational framework.

⁷ The Commission took note of the six previous Annual Reports on the application of the Code of Conduct for the Members of the Commission respectively on 25 June 2019 (SEC(2019) 266), on 12 October 2020 (SEC(2020) 344), on 20 July 2021 (SEC(2021) 299), on 29 May 2022 (SEC(2022) 226), on 18 April 2023 (SEC(2023) 163) and on 17 April 2024 (SEC(2024) 142); https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/ethics-and-good-administration/commissioners-and-ethics/code-conduct-members-european-commission_en#annual-reports.

⁸ Interinstitutional Body for Ethical Standards for Members of Institutions and Advisory Bodies of the EU - European Commission ; [EUR-Lex - 32024Q01365 - EN - EUR-Lex](#)

The European Parliament assumed the role of inaugural chair of the Body's secretariat for 2024-2025. The Commission actively contributed to the preliminary works. This collaborative effort sets the stage for the Body's first official meeting in 2025. The aim is to establish common (ethical) standards for the participating EU institutions by 2025.

2. IMPLEMENTATION OF THE CODE OF CONDUCT FOR THE MEMBERS OF THE COMMISSION, IN GENERAL

2.1. Update of the declarations of interest of the Members of the Commission

In compliance with Article 3(3) of the Code of Conduct, former Members of the European Commission re-submitted their updated declarations of interests at the beginning of 2024. The Secretariat-General, operating under the President's authority, reviewed these declarations to ensure their completeness and confirmed that no conflicts of interest were present. These declarations were subsequently published on each Member's individual website, as well as a dedicated page on the Europa website, in early 2024.

In preparation for the new Commission mandate, the candidate for President and the Commissioners-designate submitted their declarations of interests to the European Parliament in line with Article 3(2) of the Code in order to allow the Parliament to examine the declarations, as laid down in their Rules of Procedure. The declarations were published on the European Parliament's website.

After the Commission took office on 1 December 2024, all Members were invited to update their declarations at the beginning of 2025. This exercise coincides with the mandatory annual update envisaged in the Code of Conduct. As set out in Article 4(2) of the Code, these declarations are subsequently scrutinised by the Secretariat-General under the authority of the President to ensure completeness, and compatibility of the declared information with the provisions of the Code and the commitments made by the designated Members before the European Parliament. Once scrutinised, the declarations are published in electronic format on the respective website of each Member and in a machine-readable format on the website dedicated to the Code of Conduct. This corresponds to the publication requirements set out in Article 3(5) of the Code.

2.2. Participation of the members of the Commission in the European election campaign

Article 10 of the Code of Conduct states that the Members of the Commission may participate in election campaigns to the European Parliament, including as candidates, and that they must inform the President of the Commission of the role they expect to play in the campaign.

In the run-up to the European elections of 6-9 June 2024, the Guidelines on Ethical Standards for the participation of the Members of the Commissions in the European election campaign

of 2019 were revised and strengthened. New Guidelines were adapted by President von der Leyen on 24 January 2024 so as to remain a permanent framework for future European elections (P(2024) 2)⁹.

The new Guidelines provide a framework for ensuring that the participation of Members in European election campaigns is conducted in a transparent and ethical manner. They establish a clear distinction between the ongoing institutional activities of Members of the Commission and their individual campaign activities, in order to safeguard the impartial and independent functioning of the Commission as an institution.

The Members of the Commission are required to abide by the relevant obligations, including informing the President of their intention to participate in the campaign. The President, in turn, informs the European Parliament about the candidates and the measures put in place to ensure compliance with ethical obligations, as outlined in the Guidelines.

Members are also required to make arrangements for the continued performance of their institutional duties, update their declarations of interests, and clearly label and distinguish their social media accounts.

Members are prohibited from using any Commission resources for campaigning activities, except for existing security arrangements.

Furthermore, they are expected to distinguish between public statements made as election campaigners and those made in an institutional role, and to continue following the Commission's rules regarding meetings with interest representatives, gifts, and hospitality. Any financial or material support given to the campaign by a third person must be referred to the party or the campaign management.

Finally, Members are required to inform the President about any conflict of interest or doubt regarding their ethical obligations.

Several members of the previous College of Commissioners ran in the 2024 European Parliament elections, with some transitioning to parliamentary roles. Virginijus Sinkevičius, former Commissioner for Environment, Oceans, and Fisheries, was elected as a Member of the European Parliament (MEP) and resigned from his post on 16 July 2024 to take up his new mandate. Adina-Ioana Vălean, Commissioner for Transport, also won a seat and stepped down on 15 July 2024. Dubravka Šuica won a seat but opted to continue her work in the Commission instead of taking up her MEP mandate. Similarly, Valdis Dombrovskis led his party to electoral success and was elected as an MEP but declined the mandate following his re-nomination as a European Commissioner. Last, both President von der Leyen and Nicolas Schmidt, former

⁹ [Guidelines on ethical standards for the participation of the Members of the European Commission in the election campaign to the European Parliament | European Commission](#)

Commissioner for Jobs and Social Rights, ran in the European Elections as Spitzenkandidat for their respective European political party.

College members informed the President of their intention either to publicly support candidates for the European Parliament elections or to run themselves, and President von der Leyen informed the College, as required by the Code of Conduct.

2.3. Participation of the members of the Commission in election campaigns at Member State level

Article 9 of the Code foresees that the Members of the Commission may participate in a national, regional, or local election campaign, yet noting that they must provisionally withdraw from the work of the Commission if they intend to stand for election or otherwise play an active role in the election campaign.

President von der Leyen adopted the Guidelines for the participation of the Members of the Commission in election campaigns at Member State level on 24 January 2024, (P(2024)3)¹⁰.

These guidelines establish a clear distinction between active and non-active roles in national (national, regional or local) election campaigns, as well as specific directives for each role.

In the case of an active role, the Members of the Commissioner involved must withdraw from the work of the Commission during the time of their active participation in the election campaign. Their portfolios will be reallocated, they will be granted unpaid electoral leave for the duration of their active involvement. During this time, their general obligations as Members of the Commission continue to apply, including those resulting from the Code of Conduct.

A non-active role in an election campaign entails that the Commissioner's participation is significantly limited in terms of visibility and intensity.

If the President considers that a Commissioner's involvement in an election campaign at Member State level consists of a non-active role, the Commissioner will not be asked to take unpaid electoral leave and will continue to perform his or her duties.

Combining the performance of duties with occasional and limited campaign activities requires particular attention to distinguish between institutional activities as a member of the Commission and an activity in support of a campaign. To this end, the guidelines establish specific requirements for Commissioners participating in election campaigns, including the use of Commission resources, public statements and interventions, meetings with interest representatives, and conflicts of interest.

¹⁰ https://commission.europa.eu/document/download/d1f1ca97-c406-4bb5-ac60-f65d1b8ea063_en?filename=participation-of-ec-members-in-member-state-level-election-campaign-guidelines_en.pdf

In 2024, Commissioner McGuinness informed the President of her planned participation in political activities ahead of the Irish general election in November 2024. While not a candidate herself, she committed to limited campaign activities, such as canvassing, mainly on weekends. She assured that her campaign involvement would not affect her duties as Commissioner, maintaining a strict separation between her official role and political activities, with no use of Commission resources, in line with Article 9 of the Code of Conduct for the Members of the College of Commissioners and the guidelines for participation in election campaigns at the member state level.

2.4. Transparency requirements

Transparency is essential for maintaining the trust of citizens in the legitimacy of the political, legislative and administrative processes of the Union. Contacts with stakeholders should therefore be conducted with transparency. To that effect, the Commission is committed to promoting ethical and transparent interest representation by means of the Transparency Register established by the relevant Interinstitutional Agreement¹¹.

Article 7(1) and (2) of the Code sets out that the Members of the Commission and their members of Cabinet shall meet only those organisations or self-employed individuals that are registered in the Transparency Register inasmuch as they fall under its scope and shall make public information on such meetings in accordance with Commission Decision 2014/839/EU, Euratom¹². The Commission publishes systematically such information on meetings with interest representatives in a standardised format on the websites of the Members of the Commission. The Commission also makes publicly available a list of published meetings also on the entry of the interest representative concerned in the Transparency Register¹³.

On 4 December 2024, the Commission adopted a new decision on transparency measures concerning meetings held between Members of the Commission and interest representatives¹⁴. That decision repeals Commission Decision 2014/839/EU, Euratom and applies from 1 January 2025. In accordance with its terms, Members of the Commission shall (continue to) make public information on all meetings held by them or by members of their Cabinets with

¹¹ Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register (OJ L 207, 11.6.2021, p.1).

¹² Commission Decision 2014/839/EU, Euratom of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organizations or self-employed individuals (OJ L 343, 28.11.2014, p. 22).

¹³ https://commission.europa.eu/about-european-commission/service-standards-and-principles/transparency/transparency-register_en

¹⁴ Commission Decision (EU) 2024/3081 of 4 December 2024 on transparency measures concerning meetings held between Members of the Commission and interest representatives, and repealing Commission Decision 2014/839/EU, Euratom (OJ L, 2024/3081, 5.12.2024).

(registered) interest representatives¹⁵. In addition, minutes shall be taken of all such meetings and made public on the official websites of the Members of the Commission.

For reasons of transparency, pursuant to Article 6(2) of the Code, the Commission publishes an overview of mission expenses per Member every two months covering all missions undertaken¹⁶. The published information ensures transparency regarding both the costs and the purpose of the respective missions. In 2024, the Commission published an overview of expenses for 968 missions. A link to the relevant information can be found on each Member's respective webpage.

2.5. Meetings of the Ethics and Transparency contact points

In order to facilitate compliance with the obligations in the areas of ethics and transparency, the Commission has set up a Network of Ethics and Transparency Contact Points in the Cabinets of the Members of the Commission. The members of this Network are interlocutors for the Members of the Commission, their respective Heads of Cabinet and the services of the Commission on questions related to the practical implementation of the Members' ethics and transparency obligations, notably the annual and *ad hoc* updates of the declarations of interests, the publication of meetings held with interest representatives and the prior verification of the registration of those interest representatives in the Transparency Register, and the publication of mission costs.

The Secretariat-General organised, in 2024, three meetings of the Network, respectively held on 8 February, 14 June and 8 November.

Several subjects were discussed, including the guidelines on ethical standards for the participation of the Members of the European Commission in the election campaign to the European Parliament and in election campaigns at Member State level, rules, and best practices for post-mandate activities of former Members of the Commission and for new professional activities of Cabinets staff after leaving the Commission. Finally, the last meeting of the year dealt with the return of gifts kept on display by Commissioners and the patronage promised for events after the end of the mandate.

3. OUTGOING COMMISSION

3.1. Early termination of the mandate of Members of the Commission

¹⁵ The information that is made public consists of the date of the meeting, the location, the name of the Member of the Commission and/or member of the Cabinet, the name of the interest representative and the subject matter of the meeting.

¹⁶ An exception is made if publication of this information would undermine the protection of the public interest as regards public security, defence and military matters, international relations, or the financial, monetary or economic policy of the Union or a Member State.

Former Commissioners Virginijus Sinkevičius and Adina Vălean left the Commission mid-July to take up their seats in the European Parliament after the elections of May in 2024.

Commissioner Thierry Breton resigned from the Commission on 16 September 2024.

3.2. Awareness-raising activities on rights and duties for outgoing Members of the Commission

Outgoing Members of the Commission were informed in writing and in individual meetings about the applicable ethical duties following the end of their mandate as Members of the Commission.

In general terms, former Members of the Commission are expected to abide by the obligations arising from Article 245 of the Treaty on the Functioning of the European Union and from the Code of Conduct for the Members of the Commission, notably regarding the respect of confidentiality of all matters related to their mandate, collegiality, and discretion. In addition, they must ensure that any new functions, activities, or benefits are accepted in accordance with the Code. This includes obtaining the necessary authorisations and approvals from the Commission.

3.3. Post term of office activities of former Members of the Commission

Article 11 of the Code requests former Members to inform the Commission about their envisaged post term of office activities, so that the Commission can take a decision on their compatibility with Article 245(2) of the Treaty on the Functioning of the European Union.

In 2024, the Commission adopted 14 decisions on post term of office activities notified by Executive Vice-President Vestager, High-Representative/Vice President Borrell, Vice President Jourová and Commissioners Gabriel, Wojciechowski, Ferreira, Johansson, Urpilainen, Simson and McGuinness.

All decisions and the related opinions of the Independent Ethical Committee, where such opinions were necessary or sought by the President, are published as set out in Article 11(7) of the Code.

4. INCOMING COMMISSION

4.1. Professional ethics at the core of the new Commission's basic principles

As from the outset, President-elect Ursula von der Leyen emphasised her deep attachment to the respect of professional ethics, which should constantly guide the behaviour of the future members of the College presided by her. The Rules of Procedure of the Commission adopted on 4 December 2024, the Working Methods of the European Commission adopted by the

President and the Mission letters sent by the President to each Member of the Commission emphasise the importance of ethical conduct and of abiding by the Code of Conduct.

4.2. Declarations of interests of the designated Members of the Commission

The candidate for President and the Commissioners-designate submitted their declarations of interests to the European Parliament in line with Article 3(2) of the Code in order to allow the Parliament to examine the declarations. The declarations were published on the European Parliament's website.

4.3. Information to the incoming Members of the Commission regarding the ethics obligations

The incoming Members of the Commission received information on ethics obligations in writing, including on the Code of Conduct for the Members of the Commission, Commission's Rules of Procedure, the Working Methods and the Mission letters. In addition, the Secretariat-General offered individual meetings.

A welcome seminar was organised in the first week of December for all staff members in the cabinets of the new Members to discuss, among others, professional ethics and issues related to the Code of Conduct.

The Members of the Commission were requested to appoint a member in their Cabinets to perform as 'Ethic and Transparency Contact Point'.

In preparation for the transition between two Commissions, an Ethics Guide was prepared to summarise and explain the ethical obligations of Members. This guide serves as a valuable resource, providing an overview of the most important ethics-related rules to which Members are expected to adhere.

The Ethics Guide also provides guidance on the participation of Members in national and European politics, including their membership in political parties or organisations, and their engagement with social partners. This guidance is designed to ensure that Members can engage in these activities in a way that is consistent with their obligations as Members of the Commission.

In the same context, the Commission established a new intranet hub for new Members and their Cabinet staff, which includes a dedicated page outlining ethical obligations and outlining the key principles and guidelines to which new Members of the Commission are expected to adhere. This serves as a valuable resource, enabling new Members to quickly familiarise themselves with the Commission's ethical standards and expectations.

5. INDEPENDENT ETHICAL COMMITTEE

Article 12 of the Code established an Independent Ethical Committee which, upon request of the President, advises the Commission on any ethical question related to the Code and provides general recommendations to the Commission on ethical issues relevant under the Code. Article 13 foresees that the current report must encompass the work of the Independent Ethical Committee.

5.1. Meeting held

In 2024, the Committee held one meeting on 22 April. The meeting enabled the Commission to inform the Committee about internal developments within the Commission and to debrief the Committee on the progress regarding the Interinstitutional EU Ethics Body. The internal developments included the introduction of new staff members and the reassignment of responsibilities.

The Committee also discussed the Interinstitutional EU Ethics Body, focusing in particular on the provisional agreement, its composition, and its double mandate, which includes setting global standards and providing advisory competence. The meeting also touched on organisational issues and calendar scenarios for the establishment of the Interinstitutional Ethics Body.

The Committee exchanged views on the different nature and mandates of the Commission's Independent Ethical Committee and the Interinstitutional Ethics Body and emphasised the need for coordination and information sharing between the two bodies.

5.2. Opinions delivered

On 23 August 2024 the Committee issued its opinion on Executive Vice-President Margrethe Vestager's post term of office professional activity as Chairperson of the Board of Governors of the Technical University of Denmark ('Danmarks Tekniske Universitet').

On 8 November 2024, the Committee issued its opinion on Commissioner Janusz Wojciechowski's post term of office professional activities linked to his former activity as advocate, including his involvement with the charity Foundation 'Helping the Wronged'.

In December, the Committee issued two opinions on two notifications of envisaged post mandate activities about which the Commission did not take any decision in 2024.

This Annual Report will be published.