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DECISION OF THE EUROPEAN COMMISSION

on Former Commissioner Ylva Johansson's post term of office professional activities in a new joint structure in charge of the management of collectively agreed occupational pension and insurance

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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,

Whereas:

- 1) According to Article 245(2) 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 Article 11(3), second subparagraph.

- 4) On 29 April 2026, Former Commissioner Ylva Johansson informed the Commission about her intention to accept an assignment in a new joint structure, established on 23 March 2026, tasked with managing pensions agreed in collective agreements between the Swedish social partners, namely the Confederation of Swedish Enterprises (*'Svenskt Näringsliv'*), the Swedish Trade Union Confederation (*'Landsorganisationen i Sverige'*) and the Council for Negotiation and Cooperation (*'Privattjänstemannakartellen'*). She provided the Commission with additional information on her envisaged assignment on 8 May 2026.
- 5) Former Commissioner Johansson explained that, in Sweden, the biggest part of the pensions paid to citizens after retirement comes from pensions that have been agreed in collective agreements between the social partners in the labour market. These pensions have so far been managed by three companies, namely Avtalat AB, Collectum AB and Fora AB, which are owned by the Swedish social partners ⁽¹⁾.
- 6) The new joint structure will be composed of these three companies. It will work in a unified manner and coherently through Avtalat AB while Collectum AB and Fora AB have mandates that are complementary to Avtalat AB.
- 7) Avtalat AB is a production and information company with responsibility for communication, customer interfaces, IT, business and process development, as well as administrative support functions such as HR and finance. Collectum AB administers and is responsible for the ITP ⁽²⁾ occupational pension plan, which covers approximately 2.7 million privately employed white collar workers. Fora AB mainly administers and is responsible for Avtalspension SAFLO ⁽³⁾. In addition to their core business regarding the management of pensions, these companies commercialise a few associated risk insurance products for privately employed blue collar workers as well as supplementary pension and risk products for privately employed workers.
- 8) These three entities will keep their individual legal personality within the new joint structure, and Former Commissioner Johansson is envisaged to act as the chairperson of the boards of each of these three companies involved.
- 9) The new joint structure has been decided by the joint owners, namely the Confederation of Swedish Enterprise, the Swedish Trade Union Confederation and the Council for Negotiation and Cooperation.

⁽¹⁾ More precisely: Avtalat AB is owned by the Confederation of Swedish Enterprises, by the Swedish Trade Union Confederation and by the Council for Negotiation and Cooperation; Collectum AB is owned by the Confederation of Swedish Enterprises and by the Council for Negotiation and Cooperation; Fora AB is owned by the Confederation of Swedish Enterprises and the Swedish Trade Union Confederation.

⁽²⁾ 'ITP' for *'Industrins och handelstilläggspension för tjänstemän'*, in other words the supplementary pension for salaried employees in industry and commerce.

⁽³⁾ *'Avtalspension SAFLO'*, occupational pension for blue-collar workers in the Swedish private sector. 'SAF', for *'Svenska Arbetsgivareföreningen'*, which later became the Confederation of Swedish Enterprises; 'LO' for *'Landsorganisationen i Sverige'*, the Swedish trade Union Confederation.

- 10) According to the notification, by gradually bringing together all information, guidance, and services for collectively agreed occupational pension and insurance in the private sector under a single brand, *Avtalat*, a clear point of entry for customers is created. Avtalat's mission is to create strong awareness of collectively agreed occupational pension and insurance and to offer simple, accessible and efficient administration for employers and employees in the private sector. The operations are intended to contribute to increased understanding, secure choices, and smooth administration throughout working life. The new operational organisation comprises approximately 450 employees and is designed to strengthen customer benefit, increase efficiency, and create better conditions for future development.
- 11) Former Commissioner Johansson explained that Avtalat AB will work very closely with both Collectum AB and Fora AB, but these latter companies will not have very close links between each other.
- 12) The Former Commissioner underlined that there are no links between these companies and the Commission and that she does not envisage to have any contacts with the Commission in relation to these companies.
- 13) Avtalat AB, Collectum AB and Fora AB are not listed in the EU Transparency Register and do not receive funding from the EU Budget.
- 14) The Confederation of Swedish Enterprises and the Swedish Trade Union Confederation are registered in the EU Transparency Register. Several meetings between these two entities and Former Commissioner Johansson and/or with her Cabinet took place registered between 2021 and 2023, but none of them on the issue of Swedish pension management. The Council for Negotiation and Cooperation is not registered in the EU Transparency Register. None of these entities have received EU funding.
- 15) The Commission has assessed the envisaged activities and finds that, as described in Former Commissioner Johansson's notification of 29 April 2026 and in the additional information provided on 8 May 2026, they are not linked to the Former Commissioner's 'Home Affairs' portfolio. Hence, the consultation of the Independent Ethical Committee is not necessary under Article 11(3) of the Code of Conduct for the Members of the European Commission.
- 16) On substance, the notified activities do not present any risk of incompatibility with Former Commissioner Johansson's former functions as Member of the Commission or with the interests of the Commission, provided that Former Commissioner Johansson abides by all the relevant provisions of the Treaty on the Functioning of the European Union, namely Article 339, and of the Code of Conduct for the Members of the Commission, in particular the duties of collegiality and discretion with respect to the Commission's decisions and activities during her term of office, as provided for by

Article 11(1) of the Code in conjunction with Article 5 and the interdiction of lobbying the Members of the Commission or their Staff, as set out in Article 11(4) of the Code.

- 17) The Commission considers it important that both Former Commissioner Johansson, and the members of the Boards of Directors of Avtalat AB, Collectum AB and Fora AB are fully aware of the obligations and restrictions to which Former Commissioner Johansson remains subject under the Code of Conduct for the Members of the European Commission.
- 18) Furthermore, Former Commissioner Johansson should inform the President of the Commission if she has doubts with regard to the application or scope of the present decision or the Code of Conduct in general before acting on the matter relating to which the doubts arise.

HAS DECIDED AS FOLLOWS:

Article 1

Former Commissioner Johansson's post term of office activities as chairperson of the boards of Avtalat AB, Collectum AB and Fora AB, in charge of the management of collectively agreed occupational pension and insurance in the framework of a joint structure, are 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

- a) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Commissioner Johansson shall refrain from disclosing or using information of the kind covered by the obligation of professional secrecy that she obtained as Member of the Commission, in particular information about undertakings, their business relations or their cost components.
- b) 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 Commissioner Johansson remains bound by the duties of collegiality and discretion, with respect to the Commission's decisions and activities during her term of office. She 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 she obtained during her mandate in relation to the performance of her portfolio obligations and, in general, in relation to her duties as Member of the Commission.
- c) In line with Article 11(4) of the Code of Conduct for the Members of the Commission, Former Commissioner Johansson shall refrain from lobbying the Commission its Members and its Staff on behalf of Avtalat AB, Collectum AB and Fora AB on

matters for which she was responsible for within her portfolio, for a period of two years after ceasing to hold office, i.e. until 30 November 2026. It is recalled in this regard that the term ‘lobbying’ means any activity carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission as set out in Article 3 of the 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; it includes indirect lobbying on behalf of clients through indirect measures with the same objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission, such as organising or participating in meetings, conferences, events or consultation or hearings, organising communication campaigns or the preparation of positions papers, and applies independently of the location; it also covers any activity with a view to obtaining EU fundings. This prohibition 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.

- d) Former Commissioner Johansson shall share a copy of the Commission Decision with the members of the Boards of Directors Avtalat AB, Collectum AB and Fora AB and inform the Secretary-General of the Commission thereof.
- e) In line with Article 13(2) of the Code of Conduct for the Members of the Commission, Former Commissioner Johansson shall inform the President of the Commission, in a timely manner, if and when she has a doubt with regard to the application or scope 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 Brussels, on 10 June 2026.

The President
Ursula von der Leyen