

Opinion
of the
Independent Ethical Committee
established
by the European Commission
6 October 2025

Subject: Request for an opinion on Former Commissioner Breton’s envisaged post term of office activity for LCI

On request of the President of the European Commission, the Independent Ethical Committee, composed of Ms Elisabeth Morin-Chartier, Ms Alexandra Prechal and Ms Gertrud Ingestad, delivers the present opinion:

Procedure

1. On 14 July 2025, Former Commissioner Thierry Breton notified his intention to accept, as from the end of the 2025 summer holidays, a remunerated assignment for a weekly collaboration with the French television channel LCI. Mr Breton was Commissioner for Internal Market (2019-2024).
2. On 24 September 2025, the Secretary-General of the European Commission asked the Committee, on behalf of the President of the Commission, to deliver an opinion on the compatibility of this envisaged post term of office activity with Article 245 of the Treaty on the Functioning of the European Union (TFEU).

Facts

General information on LCI

3. Launched in 1994, LCI (short for La Chaîne Info – ‘The News Channel’), is a French 24-hour news channel covering national and international news, debates, analysis and commentary.
4. LCI was originally created by the TF1 Group, as the first continuous news broadcaster in France. Initially launched as a pay-TV channel, LCI became free-to-air on digital terrestrial television in 2016.
5. LCI is not a standalone company. It belongs to the French Company TF1 SA. The French industrial group Bouygues SA holds a controlling stake in TF1 SA.

Activities of LCI

6. LCI operates as a general-interest news channel, with programming that spans political, economic, international, social and cultural news. It broadcasts a mix of live news segments, in-depth debate shows, thematic magazines and special reports. Its editorial strategy gives significant space to political dialogue, current affairs analysis, expert commentary and long-form interviews. One of its declared features is a strong emphasis on fact-checking, with a dedicated unit responsible for verifying claims made in public discourse. The channel also frequently covers parliamentary activity, European affairs, public health issues and climate-related topics.

Governance of LCI

7. LCI is part of the TF1 group and its news division is integrated with TF1 Info, which oversees both TF1 and LCI's news output. The editorial governance of LCI falls under the broader structure of the TF1 group's news division. The channel is led by senior editors and journalists under the supervision of TF1's director of news. A centralised editorial board coordinates daily programming and ensures compliance with journalistic ethics and French broadcasting regulations.

Funding of LCI

8. Since becoming free-to-air in 2016, LCI began generating revenue through advertising, which is its main source of revenue.
9. LCI is wholly owned by TF1 SA, which is responsible for financing it. TF1 SA is funded almost entirely by commercial revenues (primarily advertising).

Former Commissioner Breton's envisaged activity

10. Former Commissioner Breton wishes to take on a paid assignment for a weekly collaboration with LCI.
11. This collaboration would consist in commenting topics related to current political, economic and societal subjects and challenges. This would involve editorials, commentaries, and in-depth analysis on current affairs.
12. Former Commissioner Breton is expected to intervene, during around 40 minutes, in LCI's Sunday evening programmes to be held between 18.00 and 20.00.

Links between LCI and the European Commission

13. LCI and TF1 SA are not registered in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission.
14. However Bouygues Europe (which includes Bouygues SA), which controls LCI through its stake in TF1 SA, is registered in the Transparency Register. It has estimated

annual costs related to activities covered by the register of €800,000 - €899,999. ⁽¹⁾
According to the Transparency Register, Bouygues Europe held regular meetings with Commissioner Breton and its Cabinet in the past years. ⁽²⁾

15. Publicly available information does not indicate that LCI benefits from EU funding.

16. However, LCI is subject to the EU audiovisual and competition rules applicable to it.

Legal context

17. Article 245 TFEU provides:

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.

18. Article 15(1) and (2) of the Charter of Fundamental Rights of the European Union provides:

1. Everyone has the right to engage in work and to pursue a freely chosen or accepted occupation.

2. Every citizen of the Union has the freedom to seek employment, to work, to exercise the right of establishment and to provide services in any Member State.

19. Article 2(7) of the Code of Conduct for the Members of the European Commission (hereafter the ‘Code of Conduct’) provides:

7. Former Members shall respect the obligations arising from their duties that continue to have an effect after their term, in particular the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits in line with Article 245 of the Treaty on the Functioning of the European Union, and the obligations specified in this Code of Conduct.

⁽¹⁾ [organisation detail - European Union](#), last consulted on 29 September 2025.

⁽²⁾ *ibidem*.

20. Article 5 of the Code of Conduct provides:

- 1. Members shall comply with the duty of loyalty towards the Commission and discretion in discharging their duties. They shall act and express themselves with the restraint that their office requires.*
- 2. Members shall refrain from disclosing what is said at meetings of the Commission.*
- 3. Without prejudice to the disciplinary provisions applicable to officials and other agents, Members are responsible for the proper handling and any external transmission by members of their Cabinets of classified documents, of sensitive information or of confidential documents submitted to the College for adoption or information.*
- 4. Members shall not make any comment that would call into question a decision taken by the Commission or which may harm the Commission's reputation.*

21. Article 11 of the Code of Conduct provides:

1. After ceasing to hold office, former Members shall continue to be bound by their duty of integrity and discretion pursuant to Article 245 of the Treaty on the Functioning of the European Union. They shall continue to be bound by the duties of collegiality and discretion, as laid down in Article 5, with respect to the Commission's decisions and activities during their term of office.

2. Former Members shall inform the Commission with a minimum of two months' notice of their intention to engage in a professional activity during a period of two years after they have ceased to hold office. For the purposes of the present Code, 'professional activity' means any professional activity, whether gainful or not, other than any unpaid activity which has no link with the activities of the European Union and which does not give rise to lobbying or advocacy vis-à-vis the Commission and its services such as:

- (a) charitable or humanitarian activities;*
- (b) activities deriving from political, trade unionist and/or philosophical or religious convictions;*
- (c) cultural activities;*
- (d) the mere management of assets or holdings or personal or family fortune, in a private capacity;*
- (e) or comparable activities.*

3. 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, and if the planned activity is

related to the portfolio of the former Member, it shall decide only after having consulted the Independent Ethical Committee.

Without prejudice to the possibility for the President to seek its opinion in cases of doubt, the Independent Ethical Committee does not need to be consulted where former Members intend to:

- (a) continue to serve the European interest in an Institution or Body of the European Union;*
- (b) take up functions in the national civil service of a Member State (at national, regional or local level)*
- (c) engage with international organisations or other international bodies dealing with public interests and in which either the EU or one or several of its Member States are represented;*
- (d) engage in academic activities;*
- (e) engage in one-off activities for a short duration (1 or 2 working days);*
- (f) accept honorary appointments.*

4. Former Members shall not lobby Members or their staff on behalf of their own business, that of their employer or client, on matters for which they were responsible within their portfolio for a period of two years after ceasing to hold office.

5. In the case of a former President, the periods set out in paragraphs (2) and (4) shall be three years.

6. The duties set out in paragraphs (2) and (4) shall not apply where the former Member is engaging in public office.

7. Decisions taken under paragraph (3) determining compatibility with Article 245 of the Treaty on the Functioning of the European Union and related opinions of the Independent Ethical Committee shall be made public with due consideration to the protection of personal data.

Opinion

22. The Committee notes that 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, which develops these obligations in more detail.

23. The Committee further notes that the envisaged role consists in providing commentary on current affairs. This role does not involve any lobbying or responsibilities in securing funding for LCI.
24. The link of this activity with Former Commissioner Breton's portfolio (Internal Market) is indirect. Commissioner Breton held political responsibility for the regulation of the media and the digital single market. However, providing commentary on current affairs is, as such, not directly linked to Former Commissioner Breton's past responsibilities.
25. The Committee therefore considers that Former Commissioner Breton's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union.
26. The Committee concludes that, in its view, this activity is compatible with Article 245 TFEU.
27. As in previous decisions ⁽³⁾, the Commission considers nonetheless that Former Commissioner Breton should assess the context, circumstances and scope of each television appearance to fully ascertain its compatibility with: (1) the principles of integrity and discretion set out in Article 245 of the Treaty on the Functioning of the European Union; (2) Article 339 of the Treaty on the Functioning of the European Union; and (3) Article 11(1) of the Code of Conduct for the Members of the Commission, in conjunction with Article 5 of the Code, namely the compliance with the duties of collegiality and discretion with respect to the Commission's decisions and activities during his term of office.
28. The decision 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.

Elisabeth Morin-Chartier

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Alexandra Prechal

⁽³⁾ See [Decision C\(2025\) 9003](#) of 11 March 2025 on Former High Representative / Vice-President Josep Borrell's post term of office professional arrangement with 'Thinking Heads'.