



Brussels, 12.11.2025
C(2025) 9029 final

DECISION OF THE EUROPEAN COMMISSION

on Former Vice-President Margaritis Schinas' post term of office Distinguished Fellowship at the Atlantic Council (Europe Center)

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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) With his e-mail of 30 September 2025, Former Vice-President Schinas informed the Commission about his intention to accept a non-remunerated appointment as a Distinguished Fellow with the Atlantic Council, more precisely with its Europe Center.
- 5) Former Vice-President Schinas stated that the Atlantic Council represents a well-established and respected voice in Washington DC and a consistent promoter of transatlantic cooperation and unity. Former Vice-President Schinas added that his position would mainly focus on EU-US relations.
- 6) Open sources corroborate that the Atlantic Council is a US-based think tank headquartered in Washington, D.C., with a primary focus on Europe and the transatlantic relationship and that its Europe Center is a dedicated policy forum situated within the Atlantic Council, which addresses a range of issues, including political, economic, security, and societal matters, that shape cooperation between Europe, the United States, and other global partners.
- 7) According to the information added by Former Vice-President Schinas to his notification, non-resident senior fellows contribute to the Atlantic Council's work by providing expert analysis and thought leadership. They engage in speaking engagements at Atlantic Council and external events, as well as authoring written contributions for Council publications, including commentaries and issue briefs. Additionally, they share their expertise to shape the strategic priorities and direction of the Europe Center.
- 8) The Atlantic Council's Europe Center hosts numerous fellows across its various workstreams, each focusing on specific areas aligned with the Center's priorities. These areas include the European Union's geopolitical ambitions, transatlantic trade and technology policy, bilateral relationships such as U.S.-Germany, U.S.-Italy, and U.S.-Poland, the Three Seas Initiative and the Western Balkans. Fellows are expected to meet defined deliverables, follow established operating procedures and uphold the Council's expectations in their work.
- 9) On 15 October 2025, Former Vice-President Schinas sent to the Commission additional information on his envisaged activity underlining, in particular, the key responsibilities associated with his envisaged role as a Fellow of the Atlantic Council's Europe Centre: , which fall into four primary areas: (1) Speak at Atlantic Council private and public events, interview formats, and external convenings on current affairs and longer-term developments related to the European Union, US-EU relations, geopolitics and geoeconomics; (2) Develop ideas for short- and long-form publications; (co-)authoring such publications; and/or helping to identify (co-)authors from the wider expert communities on both sides of the Atlantic; (3) Provide ideas, inputs and strategic advice for the annual priorities and program development of the Europe Center, together with the Center's leadership, staff and other fellows; (4) Co-develop new research projects and/or programming together with the Europe Center leadership and team on emerging issues in US-European relations;

- 10) Additionally, Former Vice-President Schinas specified his tasks as a Fellow of the Atlantic Council's Europe Centre in the context of the upcoming 'US-EU Strategic Dialogues' project, which entails a five-fold position: (1) Provide advices and ideas for the overall design and refining of the project, the themes to be covered, the programming elements and convenings, research focus and publication products most useful to policymakers and experts; and the recommendations developed under the project; (2) Provide inputs to agenda-setting for the project and its convenings, such as agenda documents, memos, summaries, and short-form publications derived from meetings; (3) Help identify US and European participants and speakers for the various convenings under the project and its task force model/ format; (4) Chair/ moderate convenings and individual sessions of the project and its task force; serve as a kick-off speaker/ briefer at such sessions; and participate in wider discussion fora or meetings related to the project; (5) (Co-)author op-eds or other short form publications.
- 11) According to the Atlantic Council's website, its Europe Center is led by a Senior Director, who oversees the Transform Europe Initiative and is responsible for EU-related activities, including trade, digital policy and US-EU relations. The overall governance of the Europe Center is provided by the Atlantic Council's executive leadership, comprising the President & CEO, who heads the organisation. The Europe Center does not appear to have a separate board, but works within the Atlantic Council's governance framework, which includes oversight by its Board of Directors, various Committees and fellows' network.
- 12) The Atlantic Council, including the Europe Center, is supported by a diverse range of funding sources, comprising contributions from governments, foundations and private-sector partners. In 2024, the Atlantic Council's Honor Roll of Contributors lists major financial supporters including Chevron, the Embassy of the United Arab Emirates, the Government of the United Kingdom, Adrienne Arsht, Michael Fisch / American Securities Foundation, The Rockefeller Foundation and Bahaa Hariri.
- 13) The Atlantic Council is listed in the EU Transparency Register as Think tanks and research institutions. According to the Transparency Register, the Atlantic Council promotes proactive leadership and engagement in international relations, with a focus on the Atlantic Community's role in addressing global challenges. The organisation provides a platform for navigating the complexities of the twenty-first century by informing and engaging its network of influential global leaders.
- 14) According to the EU Transparency Register, the Europe Center received €235,025 in EU grants, specifically from the European Commission's EU Policy and Outreach Partnership in the US and Policy Dialogue Support programme. Furthermore, the Europe Center has been awarded an additional €19,975 under the EU-US Strategic Dialogue on Shared Interests and Convergence programme for the current financial year.
- 15) The nature of the notified activity is not linked to Former Vice-President Schinas' responsibilities as Vice-President in charge of 'Promoting the European Way of Life'.

- 16) As for the substance, the Distinguished Fellowship offered to Former Vice-President Schinas does not present any risk of incompatibility with his former role as Vice-President in charge of ‘Promoting the European Way of Life’ or with the interests of the institution, provided that he abides by the relevant provisions of the Treaty on the Functioning of the European Union, notably Article 339, and of the Code of Conduct for the Members of the Commission, namely Article 11 in conjunction with Article 5, as concerns the protection of confidentiality of sensitive information, the protection of collegiality and discretion.

HAS DECIDED AS FOLLOWS:

Sole Article

Former Vice-President Schinas’ post term of office Distinguished Fellowship at the Atlantic Council (Europe Center) is compatible with the second paragraph of Article 245 of the Treaty on the Functioning of the European Union, subject to the following conditions and restrictions.

- In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Vice-President Schinas shall refrain from participating in any activity or decision-making procedure within the Atlantic Council which might involve using information of the kind covered by the obligation of professional secrecy regarding, in particular, undertakings, their business relations or their cost components.
- In line with Article 11(1), in conjunction with Article 5, of the Code of Conduct for the Members of the Commission, Former Vice-President Schinas remains bound by the duties of collegiality and discretion, with respect to the Commission’s decisions and activities during his term of office.

Done at Brussels, on 12 November 2025.

The President
Ursula von der Leyen