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DECISION OF THE EUROPEAN COMMISSION

**on Former Commissioner Johannes Hahn's post term of office professional
arrangements with Topspeaker and Rednerdienst & Persönlichkeitsmanagement**

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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 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 set out in paragraph 3, second subparagraph, litt. (a) to (f).
- 4) Article 12 of the Code of Conduct establishes that, on request of the President, the Independent Ethical Committee shall advise the Commission on any ethical question

related to the Code and provide general recommendations to the Commission on ethical issues relevant under the Code.

- 5) On 24 August 2025, Former Commissioner Hahn notified the Commission of his intention to become a listed speaker for two companies which will offer his services in their respective websites: (i) Topspeaker, a media and public affairs consultancy founded by Heidi Glück, and (ii) Rednerdienst & Persönlichkeitsmanagement, founded by Matthias Erhard.
- 6) Former Commissioner Hahn clarified that he plans to deliver speeches in German and English, covering a range of topics including geopolitics, Europe, economy, science and future.
- 7) Topspeaker is a speaker agency founded by Heidi Glück, which is part of her media and public affairs consulting firm, Heidi GLÜCK spirit & support. Headquartered in Vienna, the agency represents a range of keynote speakers from various fields, including politics, business, and culture, primarily in the German-speaking region. Topspeaker connects these speakers with event organisers of conferences, corporate events and seminars and also provides additional services such as speechwriting, media coaching and public communication strategy.
- 8) Topspeaker is not listed in the Transparency Register. According to open sources, the agency generates revenue primarily through professional fees for its services, which include speaker placement, public affairs consulting, and strategic communication. According to an interview Heidi Glück, the agency's daily consulting rates vary between €2,500 and €5,000, depending on the specific requirements and complexity of each project.
- 9) Rednerdienst & Persönlichkeitsmanagement is a speaker agency and media coaching firm established in 2004 by Matthias Erhard and headquartered in Grünwald, Munich.
- 10) According to open sources, Rednerdienst & Persönlichkeitsmanagement is an agency that connects high-profile speakers from various fields, including politics, business, science, media, sports and culture, with events such as conferences, seminars and cultural events. The agency also provides services such as media training, coaching, and speechwriting to help clients communicate effectively.
- 11) Rednerdienst & Persönlichkeitsmanagement is not listed in the Transparency Register. The agency operates as a private speaker agency and media consultancy, generating revenue through service fees for activities such as speaker placement, media coaching, moderation, and speechwriting
- 12) The Commission has taken several decisions in the past authorising former Members to enter into arrangements with individual speakers agencies (*speakers bureaux*) or comparable agencies, namely as concerns Former President Barroso (in 2014), Former Vice-Presidents Reding (in 2014) and Almunia (in 2015) as well as Former President Juncker, Former Commissioners Oettinger and Hogan (in 2020) and Former High Representative/Vice-President Borrell (2025).

- 13) The consultation of the Independent Ethical Committee is not necessary in view of: (1) previous comparable decisions on former Members' arrangements with speakers bureaux or comparable agencies; (2) the fact that the arrangement envisaged is not, as such, a professional activity; and (3) the fact that the arrangement envisaged will give rise to one-off speeches, conferences or lectures which correspond to the exception formulated in Article 11(3), second subparagraph, lit.(e), of the Code, which exempts one-off activities for a short duration (1 or 2 working days) from the mandatory consultation of the Independent Ethical Committee.
- 14) On substance, and in line with the Commission's previous decisions mentioned above, Former Commissioner Hahn's post term of office professional arrangements with Topspeaker and Rednerdienst & Persönlichkeitsmanagement are compatible with Article 245 of the Treaty on the Functioning of the European Union, with his former function as Member of the Commission and with the interests of the institution.
- 15) As in previous decisions, the Commission considers nonetheless that Former Commissioner Hahn should assess the context, circumstances and scope of each individual speaking engagement 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.

HAS DECIDED AS FOLLOWS:

Article 1

Former Commissioner Hahn envisaged arrangements with Topspeaker and Rednerdienst & Persönlichkeitsmanagement are compatible with Article 245(2) of the Treaty on the Functioning of the European Union.

Article 2

Before committing to any individual speaking engagement via Topspeaker and Rednerdienst & Persönlichkeitsmanagement, Former Commissioner Hahn shall assess its context, circumstances and scope in view of fully ascertaining its compatibility with:

- the principles of integrity and discretion set out in Article 245 of the Treaty on the Functioning of the European Union;
- Article 339 of the Treaty on the Functioning of the European Union, and
- Article 11(1) of the Code of Conduct for the Members of the Commission, in conjunction with Article 5 of the Code.

Done at Brussels, on 30 September 2025.

The President
Ursula von der Leyen