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**DECISION OF THE EUROPEAN COMMISSION**

**on Former Vice-President Věra Jourová's post term of office professional activity as chair of a commission set up by a consortium of European democracy organisations related to the project 'Call to Action for Democracy'**

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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) On 8 January 2026, Former Vice-President Jourová informed the Commission of her intention to accept a non-remunerated assignment as chair of a commission (hereafter the ‘*commission*’) set up by a consortium of European democracy organisations (hereafter ‘the Consortium’) to look at, and address, the crisis of representative democracy in Europe. The former Vice-President explained that the *commission* set up by the Consortium relates to an ad-hoc, fixed-term project in the field of democratic innovation and citizens’ participation whose provisional name is ‘*Call to Action for Democracy*’. The Consortium and the project were at first established by ‘G1000’, an independent non-profit organisation for democratic innovation in Belgium <sup>(1)</sup>. Former Vice-President Jourová attached to her notification a comprehensive outline of her envisaged assignment <sup>(2)</sup>.
- 5) The envisaged activity, such as notified by Former Vice-President Jourová, is related to her former Commission portfolio on ‘Values and Transparency’. The Independent Ethical Committee was therefore requested, on 13 January 2026, to deliver its opinion on the compatibility of the notified activity with Article 245 of the Treaty on the Functioning of the European Union.
- 6) The Committee delivered its opinion on 30 January 2026. The Committee first established the facts regarding: (1) the objectives of the Consortium; (2) its composition; (3) its governance; (4) its funding; (5) its planned activities; (6) the link between its leader organisation - ‘G1000’ - and the European Commission; (7) the precise scope of Former Vice-President Jourová’s envisaged position.
- 7) The Committee first noted that according to the information provided by Former Vice-President Jourová in her notification, ‘*Call to Action for Democracy*’ is a project aimed at catalysing Europe-wide democratic renewal by producing a high-profile, independent report that diagnoses the democratic crisis, showcases practical solutions, and mobilises political, civil society, and institutional actors around a shared agenda for strengthening democracy across the European Union.
- 8) More precisely, ‘*Call to Action for Democracy*’ pursues the following objectives: (a) elevate democracy as a political priority in Europe; (b) Create a shared baseline for action; (c) mobilise political will and institutional commitments; (d) strengthen and legitimise civil society’s role in democratic renewal; and (e) seed a long-term infrastructure for democratic innovation.
- 9) The Committee then quoted the names of the (currently sixteen<sup>3</sup>) democracy organisations mentioned in Former Vice-President Jourová’s notification as being the

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(1) <https://www.g1000.org/fr>

(2) The most relevant information contained in the outline attached by Former Vice-President Jourová to her notification are captured in the Independent Ethical Committee’s opinion – cfr recitals 8 to 19.

(3) Other organisations may join the Consortium in the future.

current members of the Consortium, namely: (a) *G1000* (Belgium); (b) *MehrDemokratie* (Germany); (c) *Démocratie Citoyenne* (France); (d) *Bureau Burgerberaad* (the Netherlands); (e) *DemNet* (Hungary); (f) *Shipyards Foundation* (Poland); (g) *Association for Local Democracy*; (h) *Democracy International*; (i) *Democracy Next*; (j) *European Network of Political Foundations*; (k) *International IDEA*; (l) the European University Institute; (m) *Association for the European Citizens' Initiative*; (n) *Ashoka*; (o) *Re-Imagine Europa*; (p) *Open Government Partnership*.

- 10) As regards the governance of the Consortium, the Committee noted the following information which had been shared by Former Vice-President Jourová.
- 11) A steering committee is composed by the most active members of the Consortium, who commit to meeting regularly, providing advice, helping raise funds, helping organise field trips in their respective countries and promoting the project, its findings and recommendation. The *commission* will take on its mandate from the Consortium.
- 12) The *commission* will conduct consultations in Brussels and in select countries around the continent and will promote its findings and recommendations. It will be soon composed of 10-12 high-profile members from different political, regional, professional and generational horizons with both national and European experience and credibility. In addition to the *commission's* chair (role offered to Former Vice-President Jourová), two vice-chairs with high-level political background will participate in leading the *commission*.
- 13) The steering committee and the *commission* will agree on priority issues, objectives, calendar, advocacy strategy and on key recommendations to advocate in the report (cf recital 7 above on the report expected as an output of the project).
- 14) An academic advisory board of leading scholars will oversee the scientific quality of the report and ensure it contains not just innovative, but also credible, recommendations.
- 15) A secretariat, composed by the project director and the project officer is tasked with organisational and coordination support. The lead writer, also part of the secretariat, oversees the writing of the report
- 16) On the funding of the Consortium, the Committee noted that according to the information provided by Former Vice-President Jourová in her notification, it is derived from contributions from partner institutions and especially project-specific donor support. The Committee also quoted the information shared by Former Vice-President Jourová, according to which, a separate legal and financial entity for the project has not been established: the project is financed and coordinated by 'G1000' and operates under its administrative and financial management.

- 17) The Committee noted the information shared by Former Vice-President Jourová on the specific activities foreseen for the five phases which structure the project, the whole spanning approximately one year.
- 18) In view of the pivotal role committed to 'G1000', the Committee considered in particular the link between this organisation and the European Commission. Based on publicly available information, the Committee did not identify any formal organisational link between 'G1000' and the European Commission in terms of governance or funding that is publicly documented. More precisely, the Committee noted that 'G1000' does not appear in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission.
- 19) Finally, on Former Vice-President Jourová's envisaged position, the Committee noted the information provided by the Former Vice-President, according to which, she is expected to chair two retreats of the *commission* and to set the remit of the report, determine the work plan, and agree on the final findings and recommendations. Furthermore, Former Vice-President Jourová is expected to be the chief champion, figurehead, and spokesperson of the project. This would involve a number of meetings and speaking engagements. Finally, she might also lead one or two country visits herself. The Former Vice-President will not be remunerated, she will receive no salary, consultancy fee, or honorarium. The chair of the *commission* and the *commissioners* participate on a voluntary basis, in keeping with the public-service and non-profit character of the initiative.
- 20) The Committee subsequently recalled the legal framework applicable to the assessment of the post term of office activities of former Members of the Commission and eventually concluded on the restrictions and conditions deemed necessary to ensure the compatibility of Former Vice-President Jourová's envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.
- 21) As a preliminary consideration, the Committee noted that former 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 for the Members of the European Commission, which develops these obligations in more detail.
- 22) The Committee then noted that the *commission* that Former Vice-President Jourová intends to chair acts in a field linked to her former Commission portfolio, as she was Vice-President for 'Transparency and Values'. As such, she was directly responsible for improving and defending democratic governance.
- 23) In the context of her involvement with this project, Former Vice-President Jourová would play an active role in shaping the work of the Consortium, with a view to producing operational recommendations. This role may involve advocacy to

disseminate the recommendations of the Consortium and secure commitments from EU institutions and national governments. However, this role does not involve any responsibilities in securing funding for the Consortium.

- 24) The Committee furthermore noted that the objectives of the Consortium and of Former Vice-President Jourová's involvement are not for profit and aim to achieve objectives that are widely shared, including by the European Union.
- 25) The Committee finally considered that Former Vice-President Jourová's envisaged activity does not represent a risk with regard to the interests of the Commission and of the European Union.
- 26) The Committee concluded that this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union and underlined that the activity does not warrant imposing restrictions that go beyond the respect of the obligations laid down in the Treaties and the Code of Conduct
- 27) The Committee nevertheless recommended that the Commission recalls that Former Vice-President Jourová remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying <sup>(4)</sup> Members or staff of the European Commission on behalf of the Consortium and/or of 'G1000', on matters for which she was responsible within her portfolio, for a period of two years after ceasing to hold office. This does not affect a participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its Staff.
- 28) The Committee also recommended that the Commission recall the confidentiality obligation laid down in Article 339 of the Treaty on the Functioning of the European Union, as well as the general obligations set out in Article 11(1) of the Code, in conjunction with Article 5. These articles provide that former Members of the Commission continue to be bound by the duty of integrity and discretion, as well as by the duties of collegiality and discretion with respect to the Commission's decisions and activities during their term of office.
- 29) Finally, the Committee recommended that the Commission decision also recalls that according to Article 13(2) of the Code of Conduct, former Members of the

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<sup>(4)</sup> 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 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 position papers and applies independently of the location; it also covers any activity with a view to obtaining EU funding.

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.

- 30) The Commission has considered the Committee's opinion and shares its conclusions, yet considering that the restriction on lobbying must cover all the organisations that are members of the Consortium linked to the project Call to Action for Democracy' and not only 'G1000'.

HAS DECIDED AS FOLLOWS:

*Article 1*

Former Vice-President Věra Jourová's envisaged post term of office activity as chair of the commission set up by a Consortium of European democracy organisations related to the project '*Call to Action for Democracy*' is 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*

- 1) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Vice-President Jourová 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;
- 2) 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 Vice-President Jourová 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.
- 3) In line with Article 11(4) of the Code of Conduct for the Members of the Commission, Former Vice-President Jourová shall refrain from lobbying the Commission, either on behalf of the Consortium of European democracy organisations related to the project '*Call to Action for Democracy*' or on behalf of any of the members of this

Consortium, on matters for which she was responsible within her former Commission portfolio, for a period of two years after ceasing to hold office, i.e. until 30 November 2026. This 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.

- 4) In line with Article 13(2) of the Code of Conduct for the Members of the Commission, Former Vice-President Jourová shall inform the President of the Commission, in a timely manner, if and when she has a doubt with regard to the application 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 4 March 2026.

*The President*  
*Ursula von der Leyen*