



Strasbourg, 6.5.2025
C(2025) 9013 final

DECISION OF THE EUROPEAN COMMISSION

**on Former Vice-President Margaritis Schinas' post term of office professional activity
as Director of the Chair in Strategic Autonomy Studies of the Comillas Pontifical
University**

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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 7 April 2025, Former Vice-President Schinas informed the Commission about his intention to accept a non-remunerated academic assignment with the Comillas Pontifical University as Director of the Chair in Strategic Autonomy Studies.
- 5) According to information added by Former Vice-President Schinas to his notification, this Chair is focused on the study of strategic autonomy as a key concept to understand the action of the European Union and its Member States in the coming years. The Chair will have as its main objective to implement activities focused on academic research and the transfer of knowledge to society.
- 6) The above-mentioned Chair has the mission of analysing and understanding the role of strategic autonomy in shaping Europe's position in the new global order. Its purpose is to offer a rigorous academic perspective on the political, economic, social, and security dynamics that are redefining Europe's global standing, as well as the challenges and opportunities arising therefrom.
- 7) Former Vice-President Schinas underlined that the above-mentioned Chair has an interdisciplinary nature, with the objective of analysing today's major geopolitical, economic, and social challenges. Its approach is grounded in a cross-cutting goal: to foster rigorous and well-reasoned analysis aligned with the values of the University—values that are in harmony with those of the European Union—and to create a space for research and knowledge transfer characterised by depth and academic excellence, in a rapidly changing world that increasingly unsettles citizens.
- 8) Within this framework, the Chair pursues four main objectives: (1) to study the evolution of the concept of strategic autonomy in Europe and its impact on international relations, security, economy, and society as a whole, (2) to analyse Europe's structural vulnerabilities in a multipolar world and, where appropriate, propose strategies to strengthen its autonomy, (3) to assess the challenges and opportunities linked to technological transformation in relation to strategic autonomy, and (4) to offer a space for reflection aimed at transferring this knowledge to society and future leaders.
- 9) Former Vice-President Schinas informed that his envisaged functions as Director of this Chair will entail a four-fold position, including: (1) defining the strategic lines for the development of the Chair and its core areas of work and research, (2) establishing the profile of activities and speakers who will contribute to the Chair through lectures and seminars, ensuring impact in terms of knowledge dissemination, (3) representing the Chair institutionally when required and (4) securing, when necessary, the collaboration of relevant individuals and institutions to ensure the achievement of the Chair's objectives. Former Vice-President Schinas underlined that his directorship will in any case be exercised in full compliance with the Code of Conduct for Members of the European Commission: the University will appoint, from among its faculty members, a second Director who will be responsible for overseeing the academic and

administrative day-to-day management of the Chair, ensuring the fulfilment of its general objectives and coordinating with all parties involved.

- 10) Former Vice-President Schinas will not receive any remuneration from the Comillas Pontifical University. Nevertheless, his travel expenses linked to his functions will be reimbursed.
- 11) Based in Madrid, the Comillas Pontifical University is a private higher education institution governed under the authority of the Society of Jesus ⁽¹⁾. It offers a wide range of academic programs in fields such as law, business, engineering, social sciences, and theology, with a strong emphasis on ethics, social responsibility, and humanistic values. The University includes renowned schools such as the Faculty of Economic and Business Sciences and Faculty of Law (ICADE) and the School of Engineering (ICAI). The University also promotes internationalisation through partnerships with over 200 universities worldwide, offering student exchange programs, joint degrees, and collaborative research projects.
- 12) The Comillas Pontifical University is governed by a Rector appointed by the Holy See upon proposal from the Society of Jesus. It operates under the supervision of both the Spanish educational authorities and the Vatican's Congregation for Catholic Education. The University's mission aligns with Jesuit educational principles, emphasizing intellectual rigor, service to others, and the formation of leaders committed to the common good.
- 13) The Comillas Pontifical University receives fundings from a combination of tuition fees, contributions from the Society of Jesus, private donations and fundings. Additional revenue streams include continuing education programs, executive training, and strategic partnerships.
- 14) The Comillas Pontifical University is listed in the EU Transparency Register as a non-profit higher education establishment. According to the Transparency Register, the Comillas Pontifical University is a pluralist religious university rooted in excellence, innovation, and comprehensive education. It trains highly qualified professionals with strong employability prospects and a commitment to positive social impact. The Comillas Pontifical University belongs to a national and international network of Jesuit universities and participates in numerous research and innovation platforms, including SHYNE (Spanish Hydrogen Network), FUTURED, MAUE, EDDIE ASBL, IEC, CENELEC, and EES-UETP ⁽²⁾.
- 15) According to the EU Transparency Register and the Financial Transparency System, the Comillas Pontifical University received over €1.1 million in EU funding in the most recent closed financial year (2023–2024), primarily through Horizon Europe,

⁽¹⁾ Roman Catholic religious order founded in the 16th century by Saint Ignatius of Loyola and devoted from the outset to educational activities.

⁽²⁾ [organisation detail - European Union](#)

Erasmus+, and DG Employment programmes. In 2023 alone, the University was involved in at least six Horizon Europe projects—including TWIN CINEMA, OPEN CINEMA, and SEAONCIE—with individual grant amounts ranging from €25,488 to €320,049. Additionally, the Comillas Pontifical University secured €1,934,364 under the Erasmus+ programme for the EUPEACE initiative and €220,644 from DG Employment for EUPEACE’s support actions ⁽³⁾.

- 16) The nature of the notified activity is remotely linked to Former Vice-President Schinas’ responsibilities as Vice-President in charge of ‘Promoting the European Way of Life’. However, the consultation of the Independent Ethical Committee is not necessary as the activity corresponds to the category mentioned in Article 11(3), second subparagraph, letter (d) of the Code of Conduct for the Members of the Commission.
- 17) On substance, the notified activity does not present any risk of incompatibility with Former Vice-President Schinas’ responsibilities as Member of the Commission or with the interests of the Institution.
- 18) The continued obligation to respect the duties of collegiality and discretion with respect to the Commission’s decisions and activities during Former Vice-President Schinas’ term of office, as set out in Article 11(1) of the Code of Conduct for the Members of the Commission, in conjunction with Article 5 of the Code, is fully applicable.
- 19) In addition, in order to rule out any possible lobbying concerning future decisions of the Commission on the allocation of funds, it is appropriate to set the same restriction as in previous decisions on post term of office activities in the field of university management.

HAS DECIDED AS FOLLOWS:

Sole Article

Former Vice-President Schinas’ post term of office professional activity as Director of the Chair in Strategic Autonomy Studies of the Comillas Pontifical University 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 11(4) of the Code of Conduct for the Members of the Commission, during a period of two years following his term of office, Former Vice-President Schinas shall refrain from lobbying the Members of the Commission or their staff on behalf of the Comillas Pontifical University on matters for which he was responsible as Vice-President in charge of ‘Promoting the European Way of Life’, in

⁽³⁾ https://ec.europa.eu/budget/financial-transparency-system/analysis_fr.html

particular as concerns future decisions of the Commission on the allocation of funds. This prohibition on lobbying does not affect participation in public events or general exchanges of, and on, publicly available information with Members of the Commission or Commission staff.

- 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 Comillas Pontifical University 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 Strasbourg, on 6 May 2025.

The President
Ursula von der Leyen