



Brussels, 19.3.2025
C(2025) 9007 final

DECISION OF THE EUROPEAN COMMISSION

on Vice-President Věra Jourová's post term of office activities with GLOBSEC

DECISION OF THE EUROPEAN COMMISSION

on Vice-President Věra Jourová's post term of office activities with GLOBSEC

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 her letter of 19 December 2024, Former Vice-President Věra Jourová notified the Commission about her intention to accept a two-fold assignment with GLOBSEC. More precisely, Ms Jourová explained that she intended to be part of the Czech Preparatory Board and lead the International Advisory Programme Board of the upcoming GLOBSEC Forum, in June 2025, as well as to become Advisor for the 'Centre for Global Europe' of GLOBSEC.
- 5) Ms Jourova explained that the annual GLOBSEC's Forum is the flagship event of the organisation and that her participation to the preparatory work of the June 2025 Forum would entail being part of a small group of advisors helping with the preparations, in particular providing advice to the executive level on the agenda and speakers at the Forum. Ms Jourova underlined that her advisory, non-executive, role will not be remunerated and that she intended to commence her position on 1 February 2025.
- 6) GLOBSEC is a well-known and highly respected think tank and non-governmental organization dedicated to shaping global policy and fostering transatlantic cooperation. As outlined in Ms Jourová's letter, GLOBSEC addresses critical challenges in global security, sustainability, digital transformation, and democratic resilience.
- 7) The organization is known for hosting high-level events, including the annual GLOBSEC Bratislava Forum, which gathers policymakers, business leaders, and experts to discuss pressing global issues and strategic priorities. According to open sources, GLOBSEC conducts, in addition to its events, in-depth research and publishes reports that inform policy discussions, particularly regarding Europe's role on the global stage and emerging trends. It actively engages policymakers, senior leaders, and stakeholders from various sectors to drive change and create solutions to societal, economic, and security challenges.
- 8) GLOBSEC is registered in the Transparency Register under the category of 'non-governmental organisations, platforms and networks and similar'. GLOBSEC has contributed to several European Commission consultations and initiatives, focusing on democracy, digital policy, and health preparedness, some of them related to the former Vice-President's portfolio.
- 9) According to the Transparency Register, Vice-President Jourová participated in several meetings with GLOBSEC, including discussions on disinformation held in Bratislava on 29 May 2023 and an online panel at the GLOBSEC 2020 Bratislava Forum, where the future of democracy in a post-COVID world was explored. Her Cabinet members have also represented her in multiple meetings. The latter include, among others, preparatory discussions for the 2023 and 2024 GLOBSEC Forum (e.g., in 2024 and 2023).

- 10) The envisaged activity such as notified by Ms Jourova is related to her former Commission portfolio on ‘Values and Transparency’. The Independent Ethical Committee was therefore requested, on 31 January 2025, to deliver its opinion on the compatibility of the notified activity with Article 245 of the Treaty on the Functioning of the European Union.
- 11) The Committee delivered its opinion on 28 February 2025. The Committee first established the facts regarding the nature, the activities, the governance structure and the funding of GLOBSEC, its links with the European Commission and the precise scope of Former Vice-President’s Jourova envisaged position.
- 12) The Committee then underlined that GLOBSEC is a globally recognised think tank dedicated to shaping the global debate through research activities and connecting key experts on foreign and security policy. It is based in Bratislava, Slovakia. Its mission focuses on addressing critical challenges in global security, sustainability, digital transformation, and democratic resilience, while enhancing security, prosperity, and sustainability in Europe and beyond. By fostering public-private dialogue, GLOBSEC provides a platform for collaboration across sectors, shaping future agendas and promoting international cooperation. GLOBSEC advocates for European values, while contributing to the development of a more stable, prosperous, and sustainable world.
- 13) Based on the information available in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission ⁽¹⁾, the Committee indicated that the main events organised by GLOBSEC are the GLOBSEC Forum (one of the leading conferences on global security in the world) and the annual GLOBSEC Tatra Summit (a conference that provides the ground for expert and political discussions on the future of Europe). GLOBSEC’s website mentions a third “flagship” event: the Château Béla Central European Strategic Forum (an exclusive annual gathering providing a platform for dialogue between policymakers, thinkers, non-governmental experts, business leaders and elected officials from multiple fields and countries). The Committee added that research fellows from the GLOBSEC Policy Institute publish regular analyses and responding to current challenges.
- 14) The Committee furthermore noted that, according to its website, GLOBSEC’s activities are devoted to research in seven thematic areas: Cyber Resilience, Danube Tech Valley, Democracy and Resilience, Economic Growth and Sustainability, Future of Security, Global Europe and Ukraine and Eastern Europe.
- 15) On GLOBSEC’s governance structure, the Committee noted that GLOBSEC includes an Executive Committee, an Office of the President, a Board of Directors providing strategic oversight, an International Advisory Council comprising experts from diverse

⁽¹⁾ Link to the GLOBSEC’s profile on the Transparency Register: [organisation detail - European Union](#), last consulted on 14 February 2025.

fields and a Women Leaders Council promoting gender equality and gender perspectives.

- 16) As regards funding, the Committee noted the information provided by Former Vice-President Jourová, according to which GLOBSEC is funded through a mix of grants, sponsorships, and partnerships with government bodies, private sector entities, and philanthropic organisations. The Committee recorded Ms Jourova's information whereby GLOBSEC discloses its funding sources annually and evaluates contributions to prevent potential conflicts of interest, particularly concerning its research and policy recommendations.
- 17) The Committee furthermore underlined that, according to the Transparency Register of the European Parliament, the Council of the European Union and the European Commission (the "Transparency Register"), GLOBSEC received €428,200 in EU grants in 2023. This funding was distributed as follows: €294,400 from the European Education and Culture Executive Agency (Citizens and EU Values programme) and €133,800 from the European Research Executive Agency (Inclusive Society programme). For the year 2024 ⁽²⁾, the total EU grants increased to €509,200, with €294,400 again coming from the Citizens and EU Values program, €160,000 from the Inclusive Society programme, and €54,800 from the European Health and Digital Executive Agency (Digital Europe programme). GLOBSEC estimated the annual costs related to its activities covered by the Transparency Register to fall within the range of €400,000 to €499,999.
- 18) The Committee went on underlining the links between GLOBSEC and the European Commission. First, and based on Transparency Register, the Committee noted that Former VP Jourová had participated in four meetings with GLOBSEC in 2020 and 2023, including discussions on disinformation held in Bratislava on 29 May 2023 and an online panel at the GLOBSEC 2020 Bratislava Forum, where the future of democracy in a post-COVID world was explored. GLOBSEC also held meetings with her cabinet members. These meetings included preparatory discussions for the GLOBSEC Forum and addressed issues such as election security, resilience in the transatlantic information space, and digital challenges to democracy.
- 19) The Committee also underlined that the President's Cabinet had also been involved in several high-level roundtable discussions with GLOBSEC. These included events in July 2020 that examined the EU's global engagement during the COVID-19 crisis, the European Green Deal, and the state of the Union.
- 20) Furthermore, still according to the Transparency Register, GLOBSEC submitted contributions to the EU action against abusive litigation targeting journalists and rights

⁽²⁾ According to the most recent update made by GLOBSEC on the EU Transparency Register (last consulted on 14 February 2025) E, which does not encompass the whole year (22 October 2024).

defenders, which is linked to Former VP Jourová's responsibilities in safeguarding media freedom and protecting democratic values. Additionally, its contribution to the European Democracy Action Plan consultation aligns with Former VP Jourová's work on combating disinformation. GLOBSEC also contributed to the roadmap on the Delegated Regulation on data access under the Digital Services Act, which features a link to Former VP Jourová's efforts to ensure transparency in the online environment.

- 21) Finally, the Committee established the scope of Former Vice-President Jourová's envisaged activities for GLOBSEC. According to the information provided by Former VP Jourová, the activity would include two roles, both non-executive, non-remunerated, and advisory: first, Ms Jourová would be part of the Czech preparatory board and lead the international advisory programme board of the upcoming GLOBSEC Forum in June 2025. This would entail being part of a small group of advisors helping with its preparations, providing advice to the executive level on the agenda and speakers at the Forum. Second, Former VP Jourová would advise GLOBSEC's Centre for Global Europe, providing general advice on the directions and focus of its analytical activities as well as strategic dialogue on policies related to EU's global position, knowing that the Centre for Global Europe is the centre responsible for the abovementioned "Global Europe" thematic area of GLOBSEC's activities.
- 22) The Committee noted that, according to GLOBSEC's website, GLOBSEC's Centre for Global Europe "provides constructive ideas and promotes innovative policy recommendations to ensure that the European Union remains an attractive, successful and viable project that is setting global norms and defining the international system. With an office in Brussels, the Center is a hub for analysis and strategic dialogue on EU policies shaping Europe's global standing". Its webpage indicates that it is co-funded by the European Union but does not provide additional details. ⁽³⁾
- 23) 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 in order 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.
- 24) 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.

⁽³⁾ [Centre for Global Europe | GLOBSEC - A Global Think Tank: Ideas Shaping the World](#), last consulted on 14 February 2025.

- 25) The Committee considered that GLOBSEC's activities cover many subjects: while most of them are not related to Former Vice-President Jourová's portfolio on "Values and Transparency", the Committee noted that this is the case for some of them. This is the case in particular of the activities of GLOBSEC's Centre for Democracy and Resilience.
- 26) As part of the Czech preparatory board to the upcoming GLOBSEC Forum in June 2025 and adviser to GLOBSEC's Centre for Global Europe, Former VP Jourová would carry out an advisory function. This role does not involve any lobbying or responsibilities in securing funding for the organisation.
- 27) The Committee noted that the objectives of GLOBSEC and Former VP Jourová's involvement are not for profit and aim to achieve objectives that are widely shared, including by the European Union.
- 28) The Committee therefore considered that Former VP Jourová's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union and concludes that, in its view, this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union
- 29) The Committee considered nevertheless that the Commission might wish to recall that Former Vice-President Jourová remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying Members or staff of the European Commission on behalf of GLOBSEC 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 possible participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.
- 30) The Committee also considered that the Commission decision should also 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.
- 31) Finally, the Committee considered that the Commission 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.

- 32) The Commission has considered the Committee's opinion and shares its conclusions. As concerns the interdiction of lobbying, the Commission considers that it must encompass all possible lobbying in the interest of the entities from which GLOBSEC obtains funding.

HAS DECIDED AS FOLLOWS:

Article 1

Former Former Vice-President Věra Jourová envisaged post term of office activities with GLOBSEC are 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 on behalf of GLOBSEC, and/or in the interest of the entities from which GLOBSEC obtains funding 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 Former Vice-President Věra 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 19 March 2025

The President
Ursula von der Leyen