

**THEMUDO BARATA Joao (SG)**

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**From:** SZLASZEWSKI Hubert (SG)  
**Sent:** jeudi 22 avril 2010 18:15  
**To:** 'Mr Guenter Verheugen'  
**Subject:** Code of conduct

**Importance:** High  
**Sensitivity:** Confidential

**Attachments:** notification activités post mandat note.doc

BY TELEFAX Nr: +49 331 581 77 67

Dear Mr Verheugen,

following our telephone conversation on Friday, I have looked again at the rules and consulted with the Commission's Legal Service.

Please find below the brief note, setting-out the logic of the notification obligations. What may have induced a misunderstanding is the fact, that there are two different types of notifications, based on distinct underlying principles.

You are correct in saying, that as a pensioner, and not receiving a transitional allowance, you are not required to declare your sources of earning to the Paymaster's Office (PMO). This notification requirement is related only to the financial entitlements by the PMO and does not apply to you, since there is no situation that could lead to receiving overlapping benefits.

The second type of the notification is the one that I was referring to, and relates to the Code of Conduct for Commissioners ([http://ec.europa.eu/commission\\_2010-2014/pdf/code\\_conduct\\_en.pdf](http://ec.europa.eu/commission_2010-2014/pdf/code_conduct_en.pdf)) and concern the respect of standards of non pecuniary nature set by the Treaty. The Code of Conduct (end of art. 1.1.1.) requires all former members of the College to inform the Commission in good time of their intention to engage in an occupation during the year after they have ceased office. This should allow the Commission to examine the nature of that activity from the perspective of its compatibility with the Treaty. If necessary, an independent Committee (Ad-hoc Ethical Committee) advises the Commission.

Whenever Commissioners intend to engage in an occupation during the year after they have ceased to hold office, whether this be at the end of their term or upon resignation, they shall inform the Commission in good time. The Commission shall examine the nature of the planned occupation. If it is related to the content of the portfolio of the Commissioner during his/her full term of office, the Commission shall seek the opinion of an ad hoc ethical committee. In the light of the committee's findings it will decide whether the planned occupation is compatible with the last paragraph of Article 213(2) of the Treaty.

Within the Commission, my directorate is handling these requests from former Commissioners, liaising with the Ad-hoc Committee and preparing decisions for the College.

You have mentioned on the phone, that the planned activities are compatible with the Treaty and will not create any conflict of interest. No doubt, this is the case, but the Commission needs to be in the position to ascertain it from its side; it is an element of the responsibility that the Commission carries and is held accountable for. The European Parliament and its Commission for Budgetary Control in particular is closely monitoring the application by the Commission of the Code of Conduct.

We would be grateful if you could please inform the Commission at your earliest convenience of various activities that you may consider within the year, adding information that will allow the College

to form an opinion about their nature and limits.

Please don't hesitate to contact me if you require any additional information,

Yours sincerely,

**Hubert Szlaszewski**

Director

Secretariat General

European Commission

☎ +32 2 29 95 171 📠 : +32 2 29 20 763

[hubert.szlaszewski@ec.europa.eu](mailto:hubert.szlaszewski@ec.europa.eu)



notification activités  
post ma...

Prof. Günter VERHEUGEN  
Helene-Lange-Straße 8  
DE-4469 Potsdam

29104 / 2010

European Commission  
SG Dir B  
Mr. Hubert Sztaszewski

*plus Fax +322 2920763*

Your fax from April 15 2010  
Dear Mr. Sztaszewski

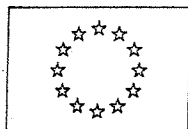
Thank you very much for your letter from April 15 2010. According to Art. 1.1.1. of the Code of Conduct for Commissioners I wish to inform you about the following

1. I will work as a political adviser for the Bundesverband der Deutschen Volksbanken und Raiffeisenbanken BVR (this is the federation of cooperative banks in Germany). The BVR is not operating as a bank; it is the political representation of some 1200 local cooperative banks in Germany. My role will not include lobbying of any kind.
2. I will work as a senior adviser/ Vice Chairman for the Royal Bank of Scotland, Niederlassung Deutschland. My role there is strictly advisory and does not include executive functions. In particular it does not include lobbying of any kind.
3. I have joined the international advisory board (IAB) of the US company FleishmanHillard International Communications. Again it is a strictly advisory role and excludes lobbying of any kind.
4. I am considering accepting the offer of TOBB (Union of chambers and commodity exchanges of Turkey) to advise the President of the organisation on international and bilateral Turkish German business relations.

All the above-mentioned activities do/ will have not the nature of an employment. They are not related to the content of portfolios, which I held during my 2 terms as a member of the European Commission.

Yours sincerely

*Günter Verheugen*  
Günter Verheugen



EUROPEAN COMMISSION  
SECRETARIAT GENERAL

SG/B – Better Regulation and Administration  
The Director

Brussels, 07 MAI 2010  
SG.B4 DCB/JTB Ares(2010)

**Note to the Members of the Ad hoc Ethical Committee**

**Mr Michel Petite**

**Mr Terry Wynn**

**Mr. Rafael García-Valdecasas**

**Subject: Post-office occupations envisaged by Mr Günter Verheugen**

Please find enclosed Mr Günter Verheugen's letter of 29 of April 2010 to me as well as the four fiches on his planned post office occupations. I would like to request the Ad hoc Ethical Committee's opinion on the compatibility of these functions with the Code of Conduct for Commissioners.

Mr Verheugen did not provide information on the expected remunerations corresponding to his new assignments. It is worthy to note that information on the expected remuneration is compulsory on an annual basis for former Commissioners who are entitled to a transitional allowance (which is not the case for Mr Verheugen, who is already retired).

I remain at the committee's disposal, should you need further information.

Kind regards,

Hubert Szałasewski

Cc: Mrs Day

Encl: 5 (letter + 4 fiches)

Prof. Günter VERHEUGEN  
Helene-Lange-Straße 8  
DE-4469 Potsdam

29104 / 2010

European Commission  
SG Dir B  
Mr. Hubert Sztaszewski

pls Fax

00322 29 534 28  
~~4322 29 75 763~~

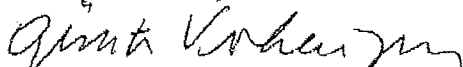
Your fax from April 15 2010  
Dear Mr. Sztaszewski

Thank you very much for your letter from April 15 2010. According to Art. 1.1.1. of the Code of Conduct for Commissioners I wish to inform you about the following

1. I will work as a political adviser for the Bundesverband der Deutschen Volksbanken und Raiffeisenbanken BVR (this is the federation of cooperative banks in Germany). The BVR is not operating as a bank; it is the political representation of some 1200 local cooperative banks in Germany. My role will not include lobbying of any kind.
2. I will work as a senior adviser/ Vice Chairman for the Royal Bank of Scotland, Niederlassung Deutschland. My role there is strictly advisory and does not include executive functions. In particular it does not include lobbying of any kind.
3. I have joined the international advisory board (IAB) of the US company FleishmanHillard International Communications. Again it is a strictly advisory role and excludes lobbying of any kind.
4. I am considering accepting the offer of TOBB (Union of chambers and commodity exchanges of Turkey) to advise the President of the organisation on international and bilateral Turkish German business relations.

All the above-mentioned activities do/ will have not the nature of an employment. They are not related to the content of portfolios, which I held during my 2 terms as a member of the European Commission.

Yours sincerely

  
Günter Verheugen

**REQUEST FOR OPINION**  
**BY THE AD-HOC ETHICAL COMMITTEE**  
**4 May 2010**

Name of the (former) Commissioner	Mr Günter Verheugen, Vice-President Entreprise and Industry
Date of the letter sent to the Commission	29.04.2010
Proposed post/occupation	Political adviser
Name of the "employer"	Bundesverband der Deutschen Volksbanken und Raiffeisenbanken (BVR – Federation of German cooperative banks)
Additional information	Mr Verheugen underlines that the BVR is not operating as a bank; it is the political representation of some 1200 local cooperative banks in Germany. Mr Verheugen's role will not include lobbying of any kind.  <a href="http://www.bvr.de/public.nsf/index.html?ReadForm">http://www.bvr.de/public.nsf/index.html?ReadForm</a>
Deadline	The Committee is kindly requested to deliver its opinion about the compatibility of the proposed occupation with the provisions of the Code of Conduct for Commissioners.

**REQUEST FOR OPINION**  
**BY THE AD-HOC ETHICAL COMMITTEE**  
**4 May 2010**

Name of the (former) Commissioner	Mr Günter Verheugen, Vice-President Entreprise and Industry
Date of the letter sent to the Commission	29.04.2010
Proposed post/occupation	Senior Adviser / Vice Chairman
Name of the "employer"	Royal Bank of Scotland (German branch)
Additional information	Mr Verheugen underlines that his role will be strictly advisory and will not include executive functions. In particular, it will not include lobbying of any kind.  <a href="http://www.rbs.com/about-rbs/g1/group-structure.ashx">http://www.rbs.com/about-rbs/g1/group-structure.ashx</a>
Deadline	The Committee is kindly requested to deliver its opinion about the compatibility of the proposed occupation with the provisions of the Code of Conduct for Commissioners.

**REQUEST FOR OPINION**  
**BY THE AD-HOC ETHICAL COMMITTEE**  
**4 May 2010**

Name of the (former) Commissioner	Mr Günter Verheugen, Vice-President Entreprise and Industry
Date of the letter sent to the Commission	29.04.2010
Proposed post/occupation	Member of the International Advisory Board
Name of the "employer"	Fleishman Hillard International Communications (US company)
Additional information	Mr Verheugen underlines that his role is strictly advisory and excludes lobbying of any kind.  <a href="http://fleishmanhillard.com/">http://fleishmanhillard.com/</a>  <i>(à noter : M. David Byrne, ancien Membre de la Commission, est un membre du Advisory Board de la société en question)</i>
Deadline	The Committee is kindly requested to deliver its opinion about the compatibility of the proposed occupation with the provisions of the Code of Conduct for Commissioners.



**REQUEST FOR OPINION**  
**BY THE AD-HOC ETHICAL COMMITTEE**  
**4 May 2010**

Name of the (former) Commissioner	Mr Günter Verheugen, Vice-President Entreprise and Industry
Date of the letter sent to the Commission	29.04.2010
Proposed post/occupation	<u>Possible</u> role of advisor of the President of TOBB, to advise on international and bilateral Turkish German business relations.
Name of the "employer"	Union of Chambers and Commodity Exchanges of Turkey (TOBB)
Additional information	<a href="http://www.tobb.org.tr/eng/organizasyon/organizasyon.php">http://www.tobb.org.tr/eng/organizasyon/organizasyon.php</a>
Deadline	The Committee is kindly requested to deliver its opinion about the compatibility of the proposed occupation with the provisions of the Code of Conduct for Commissioners.

**PEREZ BURGO Maria Ange (SG)**

annex 4

**Subject:** FW: Occupations envisaged by Mr. Verheugen

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**From:** Barbara.Dilschneider@CliffordChance.com [mailto:Barbara.Dilschneider@CliffordChance.com] **On Behalf Of** Michel.Petite@CliffordChance.com  
**Sent:** Tuesday, June 01, 2010 12:57 PM  
**To:** SZLASZEWSKI Hubert (SG)  
**Cc:** DAY Catherine (SG); CLAEYS BOUUAERT Donatienne (SG); rgvaldecasas@gmail.com; terry.wynn@talk21.com; Michel.Petite@CliffordChance.com  
**Subject:** Occupations envisaged by Mr. Verheugen

Dear Hubert,

Following your request to the Ad Hoc Ethical Committee's opinion on the compatibility of Mr. Verheugen's functions with the Code of Conduct for Commissioners, we feel that further information should be needed:

- Fleischmann Hillard Communications: What is the function of the International Advisory Board which Mr. Verheugen has joined? Are there any possible points of connection with Mr. Verheugen's previous activities as Commissioner?
- Royal Bank of Scotland: What function will Mr. Verheugen exactly exercise with RBS Deutschland? What kind of advice is expected? Will Mr. Verheugen sit on one of the organs of the Company?
- Bundesverband der Deutschen Volksbanken und Raiffeisenbanken: What will the function of "political adviser" consist of? Will Mr. Verheugen sit on one of the organs of the BVR?
- Union of Chambers and Commodity Exchanges of Turkey (TOBB): Would Mr. Verheugen sit on one of the organs of the Union?

Finally, Mr. Verheugen mentions that these activities "will not have the nature of an employment". Does this mean that he will work as an independent? Could he provide clarification on the type of contractual relationship which will be involved?

Best regards,

Michel Petite

Of Counsel

Clifford Chance LLP  
9 place Vendôme, CS 50018, 75038 Paris Cedex 01

Direct dial: +33 (0)1 44 05 52 44

[michel.petite@cliffordchance.com](mailto:michel.petite@cliffordchance.com)

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EUROPEAN COMMISSION  
SECRETARIAT-GENERAL

Directorate SG/B – Better Regulation and Administration  
The Director

Brussels, 1 JUNE 2010  
SG/B.4 DCB/JTB / Ares(2010) 328929

Mr Günter Verheugen  
Helene-Lange-Strasse, 8  
D-14469 Potsdam

By telefax: 49 331 581 77 67

Dear Mr. Verheugen,

The Ad-hoc Ethical Committee has informed today the Commission, that in order to issue their opinion, they will need some additional information. I realize that you wish this procedure to be rapidly over, so I take the liberty to forward to you the questions directly, as they came.

- Fleischmann Hillard Communications: What is the exact function of the International Advisory Board? Are there any possible points of connection with Mr. Verheugen's previous activities as Commissioner?
- Royal Bank of Scotland: What function will Mr. Verheugen exactly exercise with RBS Deutschland? What kind of advice is expected? Will Mr. Verheugen sit on one of the organs of the Company?
- Bundesverband der Deutschen Volksbanken und Raiffeisenbanken: What will the function of "political adviser" consist of? Will Mr. Verheugen sit on one of the organs of the BVR?
- Union of Chambers and Commodity Exchanges of Turkey (TOBB): Would Mr. Verheugen sit on one of the organs of the Union?

Finally, Mr. Verheugen mentions that these activities "will not have the nature of an employment". Does this mean that he will work as an independent? Could he provide clarification on the type of contractual relationship which will be involved?

Hopefully, with this information, the Committee will be in the position to deliver its opinion so that the Commission can take a decision.

Yours sincerely,

Hubert Szałasewski

Copy: Catherine Day

## GÜNTER VERHEUGEN

ANNEX 6

### FAX

**An:**

European Commission

Mr. H. Szlaszewski

copy: Catherine Day

**Faxnummer:**

**Datum:** 03/06/2010

+32 2295 3428

3 pages

**Betreff:** Your fax of 1 June, requesting additional information

Dear Mr. Szlaszewski,

Please find below the answers to the questions, raised by the Ethical Committee. I would be grateful if you would be so kind to share them with the members of the Ethical Committee.

### **FleishmanHillard Communications:**

The International Advisory Board (IAB) is not a formal body or organ of the Company and does not hold separate meetings. The IAB consists of members, chosen personally and being fully independent from the operations of the Company. FleishmanHillard however expects members of that Board to deliver contributions and speeches in seminars or conferences organised by the Company. These events may be internal, may be public. I do not see any possible connection to my previous responsibilities within the European Commission. I have been chosen for my professional life- time experience and I am not supposed to be involved in any kind of business activities of FleishmanHillard as regards it individual customers.

### **Royal Bank of Scotland (Germany) - RBS**

The exact role is that of an external advisor and the title Vice Chairman is purely decorative. I am not supposed to sit in any organs of the RBS, not to take part in any individual decisions on transactions or the day- to- day - business of RBS. As part of the externals advisors of RBS I am expected to politically discuss with the management of the company the external framework conditions under which the company operates- such as the situation of international financial markets, the crisis of the Euro and the political

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## GÜNTER VERHEUGEN

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responses to it.

### **Bundesverband der Deutschen Volksbanken - BVR**

The exact role is that of an external advisor and again, I am not supposed to sit in any organs of the BVR. BVR is the federal platform of German Volksbanken and Raiffeisenbanken. These are the local cooperative banks in Germany. BVR is not an institution involved in any operational bank business of any kind. As an external (political) advisor I am expected to deliver speeches and contributions in conferences and seminars organised by BVR for its members and for the broader public. Moreover upon request I shall deliver analytical background briefings concerning the international political situation and global economic developments to the President of BVR.

### **Union of Chambers and Commodity Exchanges of Turkey - TOBB**

The exact role is that of an external advisor and again, I am not supposed to sit in any organs of the TOBB. I am expected to advise the President of TOBB on political and economic matters as well as on bilateral German-Turkish relations. Therefore it is foreseen to have regular eye-to eye meetings with the President of TOBB and I also may accompany him at major international events. Moreover I am expected to deliver speeches and contributions for the TOOB and its university and in conferences organised by the TOBB (or in partnership with the Turkish-German Chamber of Commerce).

### **Concerning my status**

Formally, as I am 66 years old, I am a pensioner. However given the fact that I will earn income from the advisory functions, I will have to declare myself as self employed in view of fully respecting German taxation rules. This determines the contractual relations.

Finally I would like to assure the Honourable members of the Ethical Board that I am fully conscious of the Code of Conduct to which I have subscribed. All mentioned activities explicitly exclude any type of any lobby, any direct involvement in business activities and rather build upon my professional and political life-time experience than on my previous responsibility as a Vice-President and responsible Commissioner for Enterprise and

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GÜNTER VERHEUGEN

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Industry, which I had the honour to be during the last 5 years. Therefore I have not accepted any proposal from any individual enterprise.

I hope this additional information will be appreciated.

Sincerely yours,

  
Günter Verheugen

**PEREZ BURGO Maria Ange (SG)**

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**Subject:** FW: Ad-hoc Ethical Committee - Occupations GV

**Importance:** High

**Sensitivity:** Confidential

**Attachments:** SG-B\_0608172210\_001.pdf

ANNEX 7

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**From:** SZLASZEWSKI Hubert (SG)

**Sent:** Tuesday, June 08, 2010 5:42 PM

**To:** Michel.Petite@CliffordChance.com; rgvaldecasas@gmail.com; terry.wynn@talk21.com

**Cc:** CLAEYS BOUUAERT Donatienne (SG)

**Subject:** Ad-hoc Ethical Committee - Occupations GV

**Importance:** High

**Sensitivity:** Confidential

Dear Members of the Committee,

please find attached a copy of the fax message from Mr. Verheugen, with responses to your questions from the 1<sup>st</sup> of June. Mr. Verheugen also confirms his commitment to respecting the obligations deriving from the Code.

<<...>>

With the holidays on the horizon, it would be excellent if the Committee could provide an opinion on these requests still within June, so that the College can adopt decisions before it goes into summer recess later next month.

Thank you and kind regards, H

Hubert Szlaszewski  
Director  
Secretariat General

European Commission  
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[hubert.szlaszewski@ec.europa.eu](mailto:hubert.szlaszewski@ec.europa.eu)

ANNEX 8

**CLAEYS BOUUAERT Donatienne (SG)**

---

**From:** Barbara.Dilschneider@CliffordChance.com on behalf of Michel.Petite@CliffordChance.com  
**Sent:** lundi 28 juin 2010 16:22  
**To:** SZLASZEWSKI Hubert (SG); CLAEYS BOUUAERT Donatienne (SG)  
**Cc:** terry.wynn@talk21.com; rgvaldecasas@gmail.com; Michel.Petite@CliffordChance.com  
**Subject:** Mr Gunter Verheugen  
**Attachments:** PARIS-1-1069787-v6-Avis du Comité ad hoc dEthique - Request 7.DOC

Dear All,

Please find attached the opinion of the Ethics Committee regarding Mr Gunter Verheugen's request to the Commission.

Best regards

Michel Petite  
Of Counsel  
Clifford Chance LLP  
9 place Vendôme, CS 50018, 75038 Paris Cedex 01  
Direct dial: +33 (0)1 44 05 52 44  
[michel.petite@cliffordchance.com](mailto:michel.petite@cliffordchance.com)

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[CC]Office1[/CC]

22/07/2010



## Ad Hoc Ethical Committee

TO		DATE	28 June 2010
COPY TO		FILE REF	
FROM	Michel Petite Rafael Garcia-Valdecasas Terry Wynn	DIRECT DIAL	+33 1 44 05 52 44

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### Re:

- **Request n° 7 from the European Commission**
- **Mr Gunter Verheugen**

1. By letter of 7 May 2010, the Secretary General of the European Commission sent a request for an opinion from the Ad hoc Ethical Committee on envisaged post-office occupations of Mr Gunter Verheugen.

On the 1 June the Committee asked for further information on the request, to which a reply was given on 8 June after contacting Mr Verheugen.

2. The activities proposed are:

- i. Member of the International Advisory Board of Fleishman Hillard International Communications, a US private company doing business in Public Relations and Publicity. The role of this International Advisory Board is strictly advisory and excludes lobbying of any kind. The IAB is not a formal body or organ of the company and does not hold separate meetings. Members are expected to deliver speeches, attend seminars and conferences organised by the company.

- ii. Role of adviser to the President of TOBB (Union of Chambers and Commodity Exchanges of Turkey), to advise on international and bilateral Turkish/German business relations. The role is to meet with the President to give advice, not to sit on any organs of the company. Attending International events and giving speeches will be part of the role.

iii. Senior Adviser/Vice Chairman of Royal Bank of Scotland (German Branch). A strictly advisory role with no executive functions or lobbying. The VC title is purely decorative and the position does not demand sitting on organs of RBS.

iv. Political Adviser to Bundersverband der Deutschen Volksbanken und Raiffeisenbanken (BVR- Federation of Co-operative Banks). BVR is not a bank but the political representation of 1200 local Co-operative banks in Germany and the role will not include any lobbying. Once again the position does not involve sitting on organs of BVR but giving advice and speeches.

3. Considering the various roles do not conflict with the Code of Conduct of former Commissioners, the Ethical Committee is of the opinion that the considered activities are in conformity with article 245 (2) of the Treaty on the Functioning of the Union.



COMMISSION EUROPÉENNE

Secrétariat Général

SEC(2010) 867

Bruxelles, le 2 juillet 2010

DOCUMENT INTERNE

OJ 1925 – point 7

## TEXTE EN

ACTIVITES APRES CESSATION DE FONCTION  
D'UN MEMBRE DE LA COMMISSION

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Communication de M. le PRESIDENT

Cette question est inscrite à l'ordre du jour de la 1925<sup>ème</sup> réunion de la Commission le 6 juillet 2010.

Destinataires : Membres de la Commission  
Directeurs généraux et chefs de service

## MEMORANDUM FROM THE PRESIDENT TO THE COMMISSION

According to Article 245(2) of the Treaty on the Functioning of the European Union, the members of the Commission, when taking up 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.

Further to this Treaty provision, the Code of Conduct for Commissioners adopted on 24 November 2004 (SEC (2004) 1487/2) enacted a specific procedure for the assessment of the activities to be performed by former Commissioners. Under the Code, when Commissioners intend to engage in an occupation during the year after they have ceased to hold office, whether at the end of their term or upon resignation, they shall inform the Commission in good time. The Commission shall, then, examine the nature of the planned occupation and if the activity is related to the content of the Commissioner's portfolio during his or her full term of office, it shall seek the opinion of an *ad hoc* ethical committee.

In his letter to the Secretariat General of the Commission dated 29 April 2010, Mr Günter Verheugen informed the Commission about four planned post-office occupations, namely: (1) Political Adviser to the *Bundesverband der Deutschen Volksbanken und Raiffeisenbanken* (BVR - Federation of German Co-operative Banks); (2) Senior Adviser/Vice Chairman of the Royal Bank of Scotland (German Branch); (3) Member of the International Advisory Board of the Fleishman Hillard International Communications; (4) Advisor to the President of the Union of Chambers and Commodity Exchanges of Turkey (TOBB), to advise on international and bilateral Turkish German business relations.

The Ad hoc Ethical Committee was requested on 7 May 2010 to deliver its opinion on the compatibility of these four occupations with the Code of Conduct for Commissioners. Upon the Committee's request, Mr Verheugen provided, on 3 June 2010, additional information on each of the four above mentioned occupations. In addition to the specific information provided, Mr Verheugen stressed that he is fully conscious and subscribes to the Code of Conduct for Commissioners. He underlined that all his post-office activities above mentioned exclude any type of lobby, any direct involvement in business activities and build upon his professional and political life-time experience rather than on his previous responsibility as a Vice-President of the Commission and Commissioner in charge of Enterprise and Industry.

The Ad hoc Ethical Committee delivered its opinion on 28 June 2010. The Committee underlined the following elements:

- On Mr Verheugen's activity as Political Adviser to the Federation of German Co-operative Banks (BVR), the Committee underlined that BVR is not a bank but the federal representation of about 1200 local Co-operative banks in Germany and that Mr Verheugen's role will not include any lobbying, nor sitting on any executive organs of the BVR, but participating in seminars, giving speeches and providing opinions about the international political situation and global economic developments.
- On Mr Verheugen's activity as Senior Adviser/Vice Chairman of the German Branch of the Royal Bank of Scotland (RBS), the Committee noted that Mr Verheugen's role will be strictly advisory, with no executive functions or lobbying. The Vice-Chairman

title is purely ceremonial and this position does not demand sitting on the executive organs of the RBS.

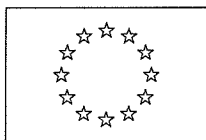
- On Mr Verheugen's assignment with the International Advisory Board of Fleishman Hillard International Communications, the Committee noted that this US company is doing business in public relations and publicity and that its International Advisory Board is not a formal body or organ of the company, does not hold separate meetings and its role is strictly advisory and excludes lobbying of any kind.
- On Mr Verheugen's role as Adviser to the President of the Union of Chambers and Commodity Exchanges of Turkey (TOBB), the Committee noted that his role is to meet with the President to give advice, to attend international events and give speeches and not to sit on any executive organs of the institution.

The Committee concluded that, in its view, Mr Verheugen's four above mentioned planned occupations do not conflict with the Code of Conduct for Commissioners and that they are in conformity with article 245 (2) of the Treaty on the Functioning of the Union.

The competent Commission services analysed the information provided by Mr Verheugen and the opinion delivered by the Ad hoc Ethical Committee. They concluded that Mr Verheugen's four above mentioned post-office occupations, such as described by Mr Verheugen, do not entail any risk of conflict of interests with regard to his former responsibilities as Vice-President of the Commission in charge of Enterprise and Industry and will not infringe Mr Verheugen's duty to behave with integrity and discretion.

Therefore, taking into account the fact that the scope of the four entities in which Mr Verheugen will be active does not directly fall within the remit of DG ENTR and that Mr Verheugen explicitly excluded any type of lobby or direct involvement in business activities, the Commission can decide that the four above mentioned post-office occupations are compatible with the Code of Conduct for Commissioners and in conformity with article 245 (2) of the Treaty on the Functioning of the Union.

The Commission is requested to endorse this view.



COMMISSION EUROPÉENNE

SECRÉTARIAT GÉNÉRAL

ANNEX 10

Bruxelles, le 6 juillet 2010

SEC(2010) 1925

OJ 1925, point 2

**Note à l'attention des Membres de la Commission**

**Résultats de la réunion hebdomadaire  
des chefs de cabinet du 5 juillet 2010**

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5 juillet 2010

**7.6. SG – ACTIVITES APRES CESSATION DE FONCTION D'UN  
MEMBRE DE LA COMMISSION**

*(SEC(2010) 867)*

Il y a accord parmi les chefs de cabinet sur la proposition présentée en séance  
par le chef de cabinet de M. le PRESIDENT.



COMMISSION EUROPÉENNE

SECRÉTARIAT GÉNÉRAL

**PV(2010) 1925**

Bruxelles, le 9 juillet 2010

DOCUMENT INTERNE

**PROJET DE PROCES-VERBAL**  
**de la 1925<sup>ème</sup> réunion de la Commission**  
**tenue à Strasbourg**  
**(Winston Churchill)**  
**le mardi 6 juillet 2010**  
**(après-midi)**

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**PV(2010) 1925**



**7.6. SECRETARIAT GENERAL – ACTIVITES APRES CESSATION DE  
FONCTIONS D'UN MEMBRE DE LA COMMISSION  
(SEC(2010) 867)**

La Commission approuve la communication qui fait l'objet du document SEC(2010) 867 concernant les activités envisagées par M. VERHEUGEN après cessation de ses fonctions au sein de la Commission. La Commission conclut que ces activités sont compatibles avec l'article 245, deuxième paragraphe, du traité sur le fonctionnement de l'Union européenne.



EUROPEAN COMMISSION  
SECRETARIAT GENERAL

SG/B – Better Regulation and Administration  
The Director

Brussels, 07/07/2010  
SG.B4 DCB/JTB Ares(2010)

**Note to the Members of the Ad hoc Ethical Committee**

**Mr Michel Petite**

**Mr Terry Wynn**

**Mr. Rafael García-Valdecasas**

**Subject: Post-office activities of Mr Verheugen**

As agreed during the meeting of the Ad hoc Ethical Committee held on 4 January 2010, I am pleased to inform the Committee that the Commission, at its meeting held on 6 July 2010, decided that Mr Verheugen's post-office activities mentioned in his letter of 29 April 2010 are compatible with the Code of Conduct for Commissioners and in conformity with article 245(2) of the Treaty on the Functioning of the European Union.

The Commission's decision was based on your Committee's opinion delivered on 28 June 2010 and on its own assessment that Mr Verheugen's post-office occupations, such as described by Mr Verheugen in his letters of 29 April and 3 June 2010, do not entail any risk of conflict of interests with regard to his former responsibilities as Vice-President of the Commission in charge of Enterprise and Industry.

The Commission took into account that the scope of the four entities in which Mr Verheugen will be active do not directly fall within the remit of DG ENTR, that Mr Verheugen explicitly excluded any type of lobby or direct involvement in business activities and decided that Mr Verheugen's post occupations will not infringe his duty to behave with integrity and discretion.

Kind regards,

Hubert Szałasewski

Cc: Ms Day, Secretary General



EUROPEAN COMMISSION  
SECRETARIAT-GENERAL

Directorate SG/B – Better Regulation and Administration  
The Director

ANNEX 13

Brussels, 07/07/2010  
SG/B/4 DCB/JTB Ares(2010)

Mr Günter Verheugen  
Helene-Lange-Strasse, 8  
D-14469 Potsdam

By telefax: 49 331 581 77 67

Dear Mr Verheugen,

I am pleased to inform you that, in conformity with the Code of Conduct for Commissioners, the Commission decided, at its meeting held on 6 July 2010, that your post-office occupations as a Political Adviser to the *Bundesverband der Deutschen Volksbanken und Raiffeisenbanken*, as a Senior Adviser/Vice Chairman of the Royal Bank of Scotland (German Branch), as Member of the International Advisory Board of the Fleishman Hillard International Communications and as an Advisor to the President of the Union of Chambers and Commodity Exchanges of Turkey (TOBB) are compatible with Article 245(2) of the TFEU.

The Commission's decision was based on the Ad hoc Ethical Committee's opinion delivered on 28 June 2010 and on the information you provided in your letters dated 29 April and 3 June 2010. The Commission took inter alia into account the fact that you explicitly excluded any type of lobby or direct involvement in business activities.

Kind regards,

Hubert Szałasewski

Cc: Catherine Day