



**EUROPEAN COMMISSION**  
**SECRETARIAT GENERAL**

**SG/B – Better Regulation and Administrative Policies**  
**The Director**

**Brussels, – 2 FEV. 2011**  
**SG.B4 DCB/JTB Ares(2011)**

**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 Mrs Meglena Kuneva and Mr Günter Verheugen**

In her letter to President Barroso dated 24 January 2011, Mrs Meglena Kuneva informed the Commission about her intention to accept a non-remunerated position, and without management responsibilities, as member of the ‘European Group’ within the Trilateral Commission. Your Committee’s opinion on the compatibility of this activity with Article 245(2) of the TFEU was not requested whereas this activity is not related to Mrs Kuneva’s former portfolio and does not entail any risk of conflict of interests. I am pleased to inform you that, at its meeting held on 2 February 2011, the Commission decided that the above-mentioned activity is compatible with article 245(2) of the TFEU.

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The Commission also decided, at its meeting of 2 February 2011, on Mr Verheugen's activities as co-founder and non-executive director of “The European Experience Company GmbH”.

The Commission decided that Mr. Verheugen’s implication with The European Experience Company is compatible with article 245(2) of the TFEU subject to the following conditions:

- “The European Experience Company” will not have professional contacts with the Commission Services over which Mr. Verheugen had authority during his second Commission mandate for a period of 26 months as from the end of Mr. Verheugen’s term of office (this period coincides with the limitation period imposed by the Commission as concerns the managing director of “The European Experience Company”, former head of cabinet of Mr. Verheugen);
- during this period, “The European Experience Company” will not provide its services

to any company or person who has been the addressee or who has benefitted from individual decisions, grants or contracts prepared or handled by the Commission's Directorate General "Enterprise and Industry" during Mr. Verheugen's second Commission mandate.

The limitations imposed by the Commission were deemed necessary to avoid any risk of conflict of interests, while preserving a proportionate measure of freedom of employment. The Commission took its decision having taken into consideration the Committee's opinion delivered on 2 November 2010 and in order to avoid that a lack of response might have been interpreted as an unconditional authorization.

Kind regards,

A handwritten signature in black ink, consisting of a stylized 'H' followed by a long horizontal stroke that ends in a small upward flick.

Hubert Sztaszewski

Cc: Ms Day, Secretary General